

	Page 86	Page 88
1	A. No.	1 Q. Did you have your own Facebook
2	Q. And when you came back to play	2 account?
3	basketball, where was Mr. Romig sitting?	3 A. I did.
4	A. On the end of the bench, the	4 Q. It was your own account, not
5	chairs.	5 your parents' or your family's account?
6	Q. And how close would that be to	6 A. No.
7	you when you were on the bench?	7 Q. Just yours.
8	A. Twenty feet, thirty feet.	8 A. Yes.
9	Q. Did he ever talk to you?	9 Q. Would he send inappropriate
10	A. No.	10 messages over Facebook?
11	Q. Was he doing anything there	11 A. Not extremely inappropriate
12	rather than watching the game?	12 because he would message me on his wife's
13	A. No.	13 Facebook.
14	Q. He never tried to coach or	14 Q. What kind of messages would he
15	anything.	15 send on Facebook?
16	A. No.	16 A. He would just ask me to come
17	Q. Did you have a stat-keeper,	17 over, see if Chelsea wanted to hang out
18	somebody who would keep score or do stats	18 so that I could come over.
19	for the team, that type of thing?	19 Q. So, he would invite you over to
20	A. I don't recall.	20 his house to hang out with Chelsea and he
21	Q. When you came back to the team,	21 would be there?
22	was there any explanation given to the	22 A. Yes.
23	team as to why Mr. Romig was no longer	23 Q. Do you have any facts or
24	the coach?	24 information about what it is that Ryan
	Page 87	Page 89
1	A. No.	1 Clymer did to investigate your allegations
2	Q. I mean, he just basically left	2 against Mr. Romig?
3	and there was no discussion about why he	3 A. No.
4	was no longer the coach for the team?	4 Q. When you came back to the team
5	A. There was no conversation while	5 after the Christmas break and were playing
6	I was there that I recall.	6 games where Mr. Romig was sitting on the
7	Q. Were you told by anybody that	7 team's chairs, did you complain about that
8	Mr. Romig had resigned as coach?	8 to somebody?
9	A. I don't believe so.	9 A. My parents. I believe they
10	Q. Was it your understanding or	10 contacted Ryan Clymer.
11	impression at the time that his no longer	11 Q. Were your parents at that game?
12	coaching the team was as a result of your	12 A. Yes.
13	allegations against him?	13 Q. So, they saw it, too?
14	A. Yes.	14 A. Yes.
15	Q. You didn't know of any other	15 Q. And you believe they contacted
16	reason why he might not be coaching. Is	16 Ryan Clymer?
17	that correct?	17 A. I believe my mom did, yes.
18	A. Correct.	18 Q. Was Romig sitting on the team
19	Q. Did Romig ever send you	19 chairs any time after that?
20	messages by Facebook?	20 A. He sat in a little cove that
21	A. Yes.	21 was two feet away from there.
22	Q. On how many occasions?	22 Q. Did you ever have any other
23	A. A lot. I can't remember a	23 contact with Eric Romig from January 1st,
24	number, but...	24 2010 until October of 2013? That was

	Page 90	Page 92
1	after Mr. Romig was arrested for acts he 2 engaged in with my client. 3 A. No. 4 Q. Did you ever see him anywhere? 5 A. No. 6 Q. At some point were you 7 contacted by detectives, Bucks County 8 detectives, to ask you questions about the 9 allegations that you made while at FCA 10 about the inappropriate sexual texting by 11 Mr. Romig? 12 A. Yes. 13 Q. Do you remember who the 14 detective was? 15 A. No. 16 Q. Do you recall where you spoke 17 to the detective? 18 A. Are you asking what city I was 19 in? 20 Q. Yes, what location. Were you 21 at your house? Were you at the police 22 office? 23 A. I was at their office, near 24 Langhorne.	1 team, asking them what they had heard, if 2 anything, about the allegations? 3 A. No. 4 Q. While you were sitting outside 5 of Pastor Jones' office and overhearing 6 this telephone conversation between Mr. 7 Clymer, Hollenbach and Mr. Romig, did you 8 ever hear Eric Romig deny sending text 9 messages to you? 10 A. Yes. 11 Q. Do you recall if they were 12 talking about the actual nature of the 13 text messages being inappropriate during 14 the telephone conversation? 15 A. I don't recall. 16 Q. Getting back to the detectives, 17 do you remember anything about the 18 conversation you had with the Bucks County 19 detectives regarding the situation between 20 you and Eric Romig at FCA? 21 A. I believe I did something 22 similar to this: I typed up what I 23 could remember, and I sat down and I went 24 over it with them.
1	Q. Near Langhorne? 2 A. Yes. 3 Q. Let me digress for one second: 4 When you came back to the team, was Robin 5 Landis still the assistant coach? 6 A. Yes. 7 Q. Did she ever say anything to 8 you or make any statements to you about 9 the situation between you and Mr. Romig 10 after you returned to the team? 11 A. She eventually told me that she 12 believed me and she apologized. 13 Q. Do you remember exactly what 14 she said? 15 A. No, not word-for-word. 16 Q. Do you know whether or not, 17 while you were no longer with the team, 18 Robin Landis or Marc Hoover talked to the 19 girls about the allegations that had been 20 made about Coach Romig? Did you ever 21 hear that from anybody? 22 A. No. 23 Q. Did you ever hear that Robin 24 Landis had talked to the girls on the	1 Q. When you say typed something 2 up, something other than what we went 3 over with Romig exhibit six, some 4 different document? 5 A. Correct, it was not this. 6 Q. Did you keep a copy of it? 7 A. I don't know if my parents have 8 it on a computer or not. I don't 9 personally, no. 10 Q. Did they ask you the same types 11 of questions that I've been asking you 12 today? 13 A. Similar. 14 Q. Do you know how long the 15 meeting lasted? 16 A. Forty-five minutes. 17 Q. I'm going to show you the first 18 page of Romig exhibit six. It's an email 19 from your mother to Ryan Clymer. 20 I'll first ask you to read that 21 to yourself for a second -- oh, you have 22 it in front of you. Just read that to 23 yourself for a second and I'll ask you 24 some questions about that.

	Page 94	Page 96
1	(Pause)	1 Q. Which assistant coach?
2	Q. Have you had a chance to read	2 A. Robin Landis.
3	that?	3 Q. Do you know whether or not she
4	A. Yes.	4 saw him touch your butt?
5	Q. Does this refresh your	5 A. I would think she did not,
6	recollection at all regarding a prior	6 considering she didn't say anything.
7	question I asked you about Robin Landis	7 Q. Were you only contacted by the
8	talking to the girls on the team and	8 detectives on one occasion?
9	asking them what they knew or heard about	9 A. Yes.
10	your texting situation with Mr. Romig?	10 Q. Did they provide you with any
11	A. No.	11 information that they had uncovered in
12	Q. You don't recall your mom's	12 their investigation of Mr. Romig that you
13	writing on this email?	13 can recall?
14	A. No.	14 A. I don't recall.
15	Q. You don't recall Ashley Makowski	15 Q. Did they show you any
16	telling you that on the 30th of December	16 documents?
17	"Robin had been talking to the girls and	17 A. No.
18	questioning whether they believed Emily"?	18 Q. Were you in contact with any
19	A. I don't recall.	19 employees of FCA after you graduated in
20	Q. Okay. At any point in the	20 May or June of 2010?
21	fall of 2009 did Mr. Romig ever touch	21 A. No.
22	you?	22 Q. Did Henry Thompson ever coach
23	A. Yes.	23 Chase?
24	Q. When did that occur?	24 A. Yes.
	Page 95	Page 97
1	A. During a practice. I had had	1 Q. In what sport?
2	a concussion, so I was not practicing	2 A. Basketball.
3	with the other girls.	3 Q. For how many years?
4	Q. You had a concussion before the	4 A. One.
5	practice?	5 Q. Did you know Henry Thompson
6	A. Yes.	6 while you were at FCA? Did you know
7	Q. And what happened?	7 him?
8	A. We were standing on the	8 A. I knew of him. I didn't know
9	sidelines and he touched my butt.	9 him personally.
10	Q. Was it your impression that	10 Q. Do you know if he knew your
11	when he touched you it was intentional as	11 name?
12	opposed to accidental?	12 A. I would think so.
13	A. I believe it was intentional.	13 Q. Were you ever contacted by
14	Q. Was it the type of touching of	14 Henry Thompson about this case?
15	the butt that players and athletes	15 A. Previously...
16	sometimes do when they are patting each	16 Q. At any time prior to today.
17	other after a play or something like	17 A. He had contacted Chase recently.
18	that, or was it something else?	18 Q. Did you speak to Mr. Thompson
19	A. It was something else.	19 at all yourself?
20	Q. What did you do when he did	20 A. No.
21	that?	21 Q. Did Chase speak to him?
22	A. I just moved away and my	22 A. About this situation, no.
23	assistant coach was standing right there,	23 Q. About this situation with Mr.
24	so I didn't know what to do.	24 Romig at FCA.

	Page 98	Page 100
1	A. He did not speak with him about it.	wanted to live with your biological father as opposed to living with your stepfather and your mother?
2	Q. About that. Do you know if Chase talked to Mr. Thompson about the situation involving this lawsuit against FCA?	A. No.
3	A. No.	Q. After your meeting with Ryan Clymer and you started back in school after the Christmas break, did you ever have occasion to talk to him about anything?
4	Q. Do you know what they talked about at all? Did Chase say anything to you about why Mr. Thompson was contacting him?	Not necessarily this issue with Mr. Romig, but anything at all until the time you graduated.
5	A. He just said that he had reached out to him and wanted to talk.	A. No. He never spoke to me.
6	Q. He didn't say what about?	Q. In your meeting with Ryan Clymer did you give him the names of Lauren Fretz and Kristen Kennedy -- or Kristen Kennedy as somebody that Mr. Romig may have had some inappropriate relationship with?
7	A. I believe he wanted to talk about the deposition, because from what Chase told me, he didn't want me to have to sit here and go through what the victim went through.	A. No.
8	Q. Is that all Chase told you about the conversation?	Q. When Eric Romig came to the games after the Christmas break, did his wife also come?
9	A. Yes.	A. I don't believe so.
10	Q. Do you know whether or not Chase had any further conversation with	
	Page 99	Page 101
1	Mr. Thompson after that?	Q. When you were sitting in that room with Chelsea after Coach Landis told you to meet with her and try to work out your differences, did Chelsea say anything about knowing about the allegations that you had made about her father?
2	A. He did not.	A. No.
3	Q. Did Eric Romig ever give you any gifts while he was texting you inappropriately?	Q. Do you know an individual named Mikaela Veronica?
4	A. No.	A. No.
5	Q. Did you ever tell Eric Romig, in a text message or otherwise, that you ran away from home at some point in the past with somebody that you were dating?	Q. You never heard the name?
6	A. No.	A. No.
7	Q. Had you ever done that?	Q. I want to show you what's been previously marked as Romig exhibit nine. This is an email originally from Stephanie Romig to Mr. Hollenbach, and it was sent to Mr. Hollenbach from Mr. Clymer. Just read the body of that and I'll ask you questions about that.
8	A. No.	MR. RUSSELL: What's the date of that?
9	Q. Had you ever threatened to do that?	THE WITNESS: January 7th.
10	A. No.	MR. RUSSELL: Thank you.
11	Q. Did you ever tell Mr. Romig, either by text message or in person or any other form of communication, that you were considering running away with Chase Brunner while you were at FCA?	BY MR. GROTH:
12	A. No.	
13	Q. Did you ever tell Eric Romig, in a text message or otherwise, that you	

	Page 102	Page 104
1	<p>Q. You've never seen that document before, have you?</p> <p>A. No.</p> <p>Q. This document talks about Chelsea providing some information to her mother, Stephanie Romig, about things other girls had said about you; and basically that you had told Eric Romig last year that you liked him, that you would stand close to him all the time, unlike the rest of the girls on the team; you always snuggled next to Eric when they took team pictures and multiple people have noticed this.</p> <p>Is any of that true?</p> <p>A. No.</p> <p>Q. Had any of the girls on the team ever said anything of that sort to you directly?</p> <p>A. No.</p> <p>Q. Did you ever make any comments to any of the girls on the team that you were attributing to Mr. Romig in any way?</p> <p>A. No.</p>	<p>6th, that email from her to Mr. Hollenbach.</p> <p>Stephanie Romig says, "I think that it is pure intimidation she is trying to pull and I don't think it's right."</p> <p>Do you recall ever standing at the gym door watching the practice during the time that you were told by Mr. Clymer you could no longer participate on the basketball team?</p> <p>A. No.</p> <p>MR. GROTH: All right. I have no other questions. Thank you.</p> <p>MR. RUSSELL: Let's go off the record for a second.</p> <p>(There was a discussion held off the record)</p> <p>EXAMINATION BY MR. KEMETHER:</p> <p>Q. I'm Sean Kemether. I have some questions for you. Did Eric Romig ever put his lips onto yours?</p> <p>A. No.</p>
1	<p>Q. This mentions Mikaela College. Do you know that person?</p> <p>A. I think the last name might be different, so I think I know who we're referring to, yes.</p> <p>Q. And the other name -- I guess I had that wrong. Veronica Fehr: Did you know her?</p> <p>A. Yes.</p> <p>Q. Did either of those girls ever talk to you about Eric Romig?</p> <p>A. No; they were younger than me.</p> <p>Q. Did you ever talk to them about Eric Romig?</p> <p>A. No.</p> <p>Q. This also mentions -- this is Stephanie Romig saying that Chelsea told her that you were outside the gym doors watching the entire practice during the time that you were supposedly off the team, and Stephanie Romig saying "If she is not allowed to be on the team at practice or at games, even she needs to stay away." Again, that was dated January</p>	<p>Q. Did Eric Romig ever put his lips onto your breasts?</p> <p>A. No.</p> <p>Q. Did Eric Romig ever put his lips onto your vulva?</p> <p>A. No.</p> <p>Q. Did Eric Romig ever put his lips onto your anus?</p> <p>A. No.</p> <p>Q. Did he ever put his hands onto your breasts?</p> <p>A. No.</p> <p>Q. Did he ever put his hands onto your vulva?</p> <p>A. No.</p> <p>Q. Did he ever put his hands onto your anus?</p> <p>A. No.</p> <p>Q. Did he ever put his penis into your mouth?</p> <p>A. No.</p> <p>Q. Did he ever put his penis into your vulva?</p> <p>A. No.</p>
1	Page 103	Page 105

	Page 106	Page 108
1	Q. Did he ever put his penis into	1 Q. Did you ever tell anyone that
2	your anus?	2 FCA did not handle what you're calling
3	A. No.	3 "the situation" between you and Mr. Romig
4	Q. Okay. When was the first time	4 properly?
5	you had any conversations of any kind	5 A. No.
6	with Mr. Groth or anybody from his firm?	6 Q. What specifically did Mr. Groth
7	A. April.	7 tell you during that initial meeting?
8	Q. Of this year.	8 A. He just had mentioned what was
9	A. Yes.	9 going on.
10	Q. And how many times?	10 Q. What did he mention?
11	A. Twice.	11 A. All this information that we're
12	Q. What period of time separated	12 talking about today.
13	the two?	13 Q. Well, all of that information
14	A. Four months.	14 already happened, so I'm not sure --
15	Q. Four months, okay. The first	15 could you be more detailed as to what he
16	one you mentioned, I believe, was at your	16 said?
17	parents' house?	17 A. He just asked us questions
18	A. Yes.	18 about how things happened in my case with
19	Q. And who was there?	19 Mr. Romig and how Mr. Clymer handled it,
20	A. My mother and my father.	20 both myself and my family.
21	Q. And...	21 Q. He asked questions about that?
22	A. Mr. Groth.	22 A. Yes.
23	Q. And you.	23 Q. And you responded?
24	A. And myself.	24 A. Yes.
	Page 107	Page 109
1	Q. Anyone else?	1 Q. Who else was talking?
2	A. No.	2 A. My mother and my father.
3	Q. Was your husband?	3 Q. Was there any discussion about
4	A. No.	4 Mr. Groth representing you as an attorney
5	Q. What was discussed?	5 for any reason?
6	A. Just basically the information	6 A. No.
7	that we are seeing here today, what was	7 Q. How long was this meeting?
8	going on with the case and how Faith had	8 A. An hour, an hour and a half.
9	not handled it correctly.	9 Q. Is there anything that you
10	Q. Who told you that Faith hadn't	10 talked to Mr. Groth about during this
11	handled it correctly?	11 meeting that we have not discussed today?
12	A. That's what I'm saying, but...	12 A. No.
13	Q. Did someone else tell you that?	13 Q. Okay. You mentioned there was a
14	A. My parents.	14 second meeting.
15	Q. Anyone else?	15 A. Yes.
16	A. No.	16 Q. Was that the only other time
17	Q. Did Mr. Groth?	17 you've spoken to either Mr. Groth or
18	A. Not in those words.	18 someone from his firm?
19	Q. And the situation we're talking	19 A. Yes.
20	about involving Eric Romig and you.	20 Q. When was the second meeting?
21	A. Yes.	21 A. August 7th. I believe that was
22	Q. As opposed to Eric Romig and	22 the day that we spoke.
23	Elizabeth Nace.	23 Q. And where was that?
24	A. Yes.	24 A. Again, my parents' house.

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	Page 110	Page 112
1	Q. How long was that meeting?	1 Q. Okay.
2	A. Same length: Hour, hour and a	2 MR. GROTH: Witness fee.
3	half.	3 MR. KEMETHER: I understand.
4	Q. Who was present at that	4 BY MR. KEMETHER:
5	meeting?	5 Q. Anything else?
6	A. That was just myself and my	6 A. No.
7	dad. My mom was not there.	7 Q. No. You spent an hour and a
8	Q. And?	8 half with him discussing what?
9	A. Mr. Groth.	9 A. Just reviewing this information
10	Q. So, there were three people	10 and how this meeting would work.
11	there?	11 Q. What meeting?
12	A. Yes.	12 A. This deposition.
13	Q. What was discussed during that	13 Q. So, what specifically did you
14	meeting?	14 review during the second meeting with Mr.
15	A. Just reviewing what he had sent	15 Groth in August of 2015?
16	to us.	16 A. We went over what I had
17	Q. Reviewing what who had sent to	17 previously told him in our first meeting.
18	you?	18 Q. Did you have notes?
19	A. Mr. Groth.	19 A. Did I have notes?
20	Q. What did he send to you?	20 Q. Yes.
21	A. This subpoena and the other	21 A. No.
22	paperwork.	22 Q. Did he have notes?
23	Q. What email are you talking	23 A. Yes.
24	about?	24 Q. Did your parents have notes?
	Page 111	Page 113
1	A. This.	1 A. No.
2	MR. RUSSELL: She said	2 Q. The two documents you've
3	subpoena, for the record, but...	3 referred to creating, one during 2009/2010
4	MR. KEMETHER: Subpoena? Okay.	4 and one following the interview with the
5	A. I don't know the difference...	5 police in 2013, did you have them?
6	Q. That's fine.	6 A. No.
7	A. ...about it.	7 Q. What did Mr. Groth say to you
8	Q. I'm just trying to clarify what	8 during the second meeting?
9	it is that you were given. So, you were	9 A. He reviewed with us how this
10	given Mayer-1. Was that not mailed to	10 the deposition would work, that we were
11	you?	11 under oath. That was about it.
12	A. That was mailed to me. He gave	12 Q. During the second meeting did
13	us another copy just to have and he also	13 he discuss representing you in any sort
14	gave us -- I don't know what it was, the	14 of causative case against Faith Christian
15	other paper. I don't know if you're	15 or Mr. Romig or anybody else?
16	allowed to --	16 A. No.
17	MR. GROTH: They were subpoenas	17 Q. Has there ever been a
18	from the deposition.	18 discussion about that?
19	Q. During the second meeting he	19 A. No.
20	gave you a copy of Mayer-1 and the	20 Q. What did you discuss with Mr.
21	subpoena. Is that what I'm understanding?	21 Groth during that second meeting?
22	A. Yes.	22 A. I just reviewed what I had
23	Q. Did he give you anything else?	23 previously told him about the situation in
24	A. A check.	24 2009 with Mr. Romig.

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Page 114		Page 116
1	Q. What documents have you reviewed 2 before today pertaining to anything having 3 to do with this lawsuit or your dispute 4 with Faith Christian involving Mr. Romig? 5 A. Nothing. 6 Q. If I'm understanding correctly, 7 the history of texts from Mr. Romig to 8 you that you have called inappropriate 9 lasted approximately two months. 10 A. Correct. 11 Q. At least from the end of 12 October or the beginning of November of 13 2009 until shortly before Christmas of 14 2009, correct? 15 A. Yes. 16 Q. If I'm understanding you 17 correctly, Mr. Romig did not send any 18 further texts to you after your 19 conversation with Mr. Clymer, except for 20 one. 21 A. Correct. 22 Q. Which your parents got. 23 A. Yes. 24 Q. Am I understanding correctly	1 A. No. 2 Q. You mentioned something about 3 Mr. Romig also communicating with you via 4 Facebook, I take it, during this same 5 two-month period? 6 A. Yes. 7 Q. And what was your Facebook 8 account during that time? 9 A. What was it like? 10 Q. What was the name. 11 A. Emily Mayer. 12 Q. And what was the password? 13 A. God, I don't know. I can tell 14 you that that's not the same account I 15 have today. 16 Q. What happened to the account? 17 A. Well, it's still up. I just 18 don't remember -- I didn't remember the 19 password. 20 Q. And is there anything you can 21 do to get the password -- or is it 22 changed? -- so it could be accessed? 23 A. No. 24 Q. No? Why not?
Page 115		Page 117
1	that every single one of those texts over 2 the roughly two-month period that Mr. 3 Romig sent to you you destroyed? 4 A. Correct. 5 Q. And if I'm understanding 6 correctly, whatever texts you sent to him 7 during that same time period you also 8 destroyed. 9 MR. GROTH: Objection to the 10 form. You can answer. 11 Q. Do you understand my question? 12 A. Yes. 13 Q. So, however many texts you sent 14 to him you destroyed? 15 A. Yes. 16 Q. How many texts do you think you 17 sent him during that roughly two-month 18 period? 19 A. I don't know. 20 Q. More than ten? 21 A. Yes. 22 Q. More than a hundred? 23 A. I don't know. 24 Q. More than a thousand?	1 A. Because I don't have the email 2 or the password. 3 Q. You mentioned that it's still 4 up? 5 A. I've never searched for it. 6 Q. Would you do that? 7 A. If it needs to be done. 8 Q. I'm asking you would you do 9 that, please? 10 A. Yes. 11 Q. You can report to Mr. Groth 12 about it, but I want you to find out if 13 it's still active; if so, what's the 14 email and what's the password. Okay? 15 A. Yes. 16 Q. If I understand correctly, you 17 first attended Faith Christian as a 18 sophomore in high school? 19 A. Junior. 20 Q. Junior high school. I 21 apologize. The first two years of high 22 school you spent at one other high 23 school? 24 A. I was at two other high

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	Page 118	Page 120
1	schools.	1 freshman your year in high school?
2	Q. Two other high schools. The	2 A. Yes.
3	first one was what?	3 Q. After your freshman year, you
4	A. Calvary Baptist in Lansdowne,	4 then went to Upper Pekriomen for your
5	and the second was Upper Pekriomen.	5 sophomore year?
6	Q. For the first one, did you	6 A. Yes.
7	leave that of your own accord?	7 Q. Why did you leave there?
8	A. I did.	8 A. I was just not making good
9	Q. Why did you leave?	9 friends, good choices.....
10	A. I was not getting along with	10 Q. What does that mean?
11	many of the girls there. It was very	11 A. I just wasn't choosing the
12	cliquey.	12 right group of friends. That's what that
13	Q. Was it just a girls-only	13 means.
14	school?	14 Q. What about the friends you were
15	A. No.	15 choosing was bad?
16	Q. Boys and girls, but you were	16 A. Just weren't doing things that
17	having trouble with girls?	17 I should have been doing at my age.
18	A. Yes.	18 Q. Such as?
19	Q. What were the troubles you were	19 A. I don't feel comfortable
20	having with girls?	20 answering that. I don't feel I need to
21	A. They were just judgmental.	21 answer that.
22	Q. Judgmental about what?	22 Q. I can take that up with the
23	A. My parents were divorced. It's	23 judge and ask you to come back and force
24	just...	24 you to do it.
	Page 119	Page 121
1	Q. Do you want to take a break?	1 A. Sure.
2	A. (No response)	2 Q. Were you asked to leave Upper
3	Q. Do you want to take a break?	3 Pekriomen, or did you leave of your own
4	(There was a discussion held	4 accord?
5	off the record)	5 A. I left of my own accord.
6	MR. KEMETHER: We're back on	6 Q. And starting your junior year,
7	the record.	7 you went to Faith Christian. So, you were
8	BY MR. KEMETHER:	8 at Faith Christian for approximately a
9	Q. I had asked you about what the	9 year and change before you had any
10	girls at Calvary High School were	10 problems with Mr. Romig. Is that fair to
11	judgmental about with you.	11 say?
12	A. Just judgmental. I came from a	12 A. Yes.
13	divorced home. They were very Christian	13 Q. And during that roughly year
14	people, so I was just always kind of an	14 and change, you became best friends with
15	outcast.	15 his stepdaughter Chelsea Romig.
16	Q. Was there anything other than	16 A. I mean, I was best friends with
17	the fact that your parents were divorced	17 her since the first day I started there.
18	that they were judgmental about with you?	18 I mean, it wasn't -- it didn't take us a
19	A. No.	19 year to become friends.
20	Q. And how long were you there?	20 Q. You didn't know her before you
21	A. Fourth grade to ninth grade.	21 got there. Is that fair to say?
22	Q. Fourth grade to...	22 A. That's correct.
23	A. Ninth grade.	23 Q. You became friends very quickly
24	Q. So, that would have been	24 with her. You spent time at their house?

	Page 122	Page 124
1	A. Minimally, yes.	1 A. I was asked to leave the
2	Q. You stayed overnight a couple	2 school, but they offered for me to do
3	times, at least?	3 counseling for \$100 per session with Ron
4	A. Yes.	4 Jones.
5	Q. During the junior year or the	5 Q. And did you choose to stay at
6	summer of your junior year, between your	6 school?
7	junior and senior year, the times that	7 A. I did.
8	you spent at the Romig house, did you	8 Q. Were you happy with that
9	have any problems with Mr. Romig?	9 decision?
10	A. No.	10 A. No, but I didn't think I had
11	Q. During your junior year of high	11 any choice at the time.
12	school, did you have any behavioral issues	12 Q. Did you tell your parents you
13	that you were addressed about by the	13 were unhappy with that decision?
14	school?	14 A. No.
15	A. No.	15 Q. And did you have to do certain
16	Q. Did you attend in June of 2009	16 things before you were actually going to
17	something called a junior/senior banquet?	17 be readmitted to the school?
18	A. Yes.	18 A. From what I recall, I just had
19	Q. Was that during your junior	19 to do the counseling.
20	year?	20 Q. Just the counseling sessions?
21	A. Yes.	21 A. Yes.
22	Q. School was still in session at	22 Q. And did you do them?
23	that point?	23 A. Yes.
24	A. I'm sorry, did you say it was	24 Q. Is it your understanding the
	Page 123	Page 125
1	in June?	1 reason you were asked to leave the school
2	Q. In June of 2009 was there	2 was simply because you were caught
3	something you attended called a	3 drinking following this banquet?
4	junior/senior banquet?	4 A. Yes.
5	A. Yes. I don't believe it was	5 Q. Nothing else?
6	that late in the school year, but I did	6 A. Yes.
7	attend the banquet.	7 Q. I'm correct?
8	Q. Was the banquet during your	8 A. Yes.
9	junior year of school?	9 Q. Did you have any other
10	A. Yes.	10 behavioral issues while you were at the
11	Q. Did something happen following	11 school before the problems with Mr. Romig
12	that banquet that night that you got in	12 started?
13	trouble for?	13 A. No.
14	A. Yes.	14 Q. Now, you were asked a little
15	Q. What happened?	15 earlier about your being a co-captain of
16	A. I was drinking with friends.	16 the basketball team your senior year?
17	Q. Anything else?	17 A. Yes.
18	A. No.	18 Q. And I understood you said you
19	Q. Were you caught giving oral sex	19 had no problems with that.
20	to a boy in public following that	20 A. No.
21	banquet?	21 Q. You were never asked to step
22	A. No.	22 down as a co-captain.
23	Q. Were you asked to leave the	23 A. No.
24	school following that banquet?	24 Q. So, if people testified that

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1	you in fact were, they would not be 2 telling the truth? 3 A. Correct. 4 Q. The meeting you had with Ryan 5 Clymer, do you know how many days before 6 December 25th, 2009 it was? 7 A. I don't recall. 8 Q. Do you know how many school 9 days before December 25th, 2009 it was? 10 A. I don't recall. 11 Q. Is it possible that it was the 12 last school day before the holiday 13 started? 14 A. It was possible, yes, but I 15 don't remember. 16 Q. I just want to make sure I'm 17 understanding what happened during that 18 meeting. You told us that it lasted less 19 than ten minutes. 20 A. Correct. 21 Q. I want to know, to the best of 22 your memory, everything you said during 23 that meeting. 24 A. I went in with Cheryl Alderfer.	1 A. Yes. 2 Q. And did he say to leave the 3 school and not come back? 4 A. Yes, until I was otherwise 5 told. 6 Q. Did he say to leave the team, 7 leave the school? Either? Neither? 8 Both? 9 A. Both. 10 Q. He said leave the school and 11 leave the team. 12 A. Correct. 13 Q. And that is the last time you 14 can recall discussing with Ryan Clymer 15 anything having to do with Eric Romig? 16 A. Correct. 17 Q. Are you aware of what steps 18 your parents took during the Christmas 19 break, following the Christmas break in 20 terms of your allegations against Mr. 21 Romig? 22 A. I believe that they were trying 23 to contact Ryan Clymer. 24 Q. What I want to know is, do you
Page 127		Page 129
1	I told Mr. Clymer that my basketball 2 coach, Mr. Romig, had been texting me 3 inappropriately, and that's really all I 4 remember other than him asking me to 5 leave the campus. 6 Q. So, during that 7 less-than-ten-minute period, that's the 8 only thing you remember saying to Mr. 9 Romig? 10 A. Yes. 11 Q. During that less-than-ten-minute 12 period what did Mr. Romig say to you or 13 to Mr. Alderfer? 14 MR. GROTH: Mr. Clymer. 15 Q. I'm sorry, Mr. Clymer say to 16 you or Ms. Alderfer. 17 A. All I remember is him asking me 18 to leave. There weren't many questions 19 that were asked. 20 Q. The only thing that I recall 21 Mr. Clymer saying during that meeting was 22 asking you to leave. 23 A. Yes. 24 Q. That's all I remember.	1 know anything about the specifics of that? 2 A. No. 3 Q. Your parents wouldn't have 4 shared that with you at the time? 5 A. I don't remember. 6 Q. Did you tell anybody that Faith 7 Christian did nothing about your 8 allegations? 9 A. No. 10 Q. Never said that to anybody? 11 A. No. 12 Q. Did you tell anybody that Faith 13 Christian didn't believe your allegations? 14 A. No. 15 Q. Never told that to anybody? 16 A. No. 17 Q. When the Christmas break was 18 over -- first of all, I'll stop there. 19 Were there any basketball games over 20 Christmas break? 21 A. No, I don't believe so. 22 Q. Christmas break would have been 23 roughly the two-week period? 24 A. Yes.

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1	<p>Q. Were there any practices 2 scheduled over the Christmas break? 3 A. I don't believe so, but it's 4 possible. 5 Q. By the time Christmas break 6 ended, I understand from your testimony 7 that you were back on the team, correct? 8 A. Yes. 9 Q. In school? 10 A. Yes. 11 Q. And that Mr. Romig was no 12 longer coaching the team. 13 A. Correct. 14 Q. Were you happy with that? 15 A. Yes. 16 Q. Did you tell anyone in January 17 of 2010 that you were unhappy with the 18 way the school had handled the Eric Romig 19 situation? 20 A. I don't recall ever saying that 21 to anyone, no. 22 Q. Until today have you ever told 23 anyone that? 24 A. Probably.</p>	<p>1 to anyone? 2 A. No. 3 Q. 2014? 4 A. No. 5 Q. Today, 2015? 6 A. No. 7 Q. Do you know of your parents 8 reporting any of these issues with Mr. 9 Romig to any government agency? 10 A. I don't believe so, because 11 they were told that Mr. Clymer was going 12 to handle it. 13 Q. And who said that? 14 A. Mr. Clymer said that he was 15 going to handle it. 16 Q. And who did he say that to? 17 A. To my parents. 18 Q. And how do you know this? 19 A. My parents told me. 20 Q. When did they tell you that? 21 A. In 2009, when this was 22 happening. 23 Q. What does your father do for a 24 living, your step-father?</p>
	Page 131	Page 133
1	<p>Q. Who did you tell? 2 A. Probably my husband. 3 Q. When -- 4 A. My parents. 5 Q. When? 6 A. I don't know. 7 Q. Is it fair to say that you 8 never reported that conduct to any 9 government agency in 2009? 10 A. I did not, no. 11 Q. 2010? 12 A. No. 13 Q. 2011? 14 A. No. 15 Q. 2012? 16 A. No. 17 Q. 2013? 18 A. That's when the detectives had 19 contacted me, but I did not do that on 20 my own. 21 Q. Correct, they came to you. 22 A. Yes. 23 Q. Even at that point did you then 24 report your own problems with Mr. Romig</p>	<p>1 A. He works for Merck. 2 Q. He had a different job in the 3 past? 4 A. Not since I've known him. 5 Q. Your stepfather? 6 A. Yes. 7 Q. Has he ever worked as a 8 detective, ever worked in law-enforcement? 9 A. Yes. 10 Q. Do you know when he did that? 11 A. This is previous to my knowing 12 of him, so I don't know. 13 Q. Do you know anything about what 14 he did in law-enforcement? 15 A. No. 16 Q. Were you dissatisfied with the 17 conduct of Ryan Clymer in handling 18 whatever issues you had with Eric Romig? 19 A. Yes. 20 Q. Did you ever tell anyone about 21 that? 22 A. I don't believe at the time I 23 did. 24 Q. How about up until today?</p>

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<p>1 A. I'm sure I did today, like I 2 said, to my parents, to my husband. I'm 3 sure I spoke with them.</p> <p>4 Q. To anyone at Faith Christian?</p> <p>5 A. I don't speak to anybody there.</p> <p>6 Q. You were there for school for 7 another six months after all of this 8 happened. Did you report that you were 9 unhappy with Mr. Clymer any time during 10 those six months?</p> <p>11 A. No.</p> <p>12 Q. And if I understand correctly, 13 the texts that you got where you claim 14 that Eric Romig told you that he wanted 15 to be "inside you," you received that in 16 early November of 2009?</p> <p>17 A. December, I believe.</p> <p>18 Q. It was December, you say, you 19 received it?</p> <p>20 A. Yes.</p> <p>21 Q. Early December?</p> <p>22 A. Yes.</p> <p>23 Q. And your conversation with Mr. 24 Clymer was at least in the 20s -- you</p>	<p>1 that change at some point in time?</p> <p>2 A. After.</p> <p>3 Q. After what?</p> <p>4 A. I had spoken to Ryan Clymer 5 about the situation.</p> <p>6 Q. How quickly after that meeting 7 with Mr. Clymer?</p> <p>8 A. That day.</p> <p>9 Q. That day?</p> <p>10 A. Uh-huh.</p> <p>11 Q. How did you learn that it 12 changed?</p> <p>13 A. Because she didn't speak to me 14 any more.</p> <p>15 Q. Did you ever try to speak to 16 her again?</p> <p>17 A. Yes.</p> <p>18 Q. Tell me about when you did 19 that. When after that meeting did you 20 first try to speak to her?</p> <p>21 A. I don't remember the first time 22 I tried to reach out to her, but probably 23 in school. I may have texted her. I 24 don't recall.</p>	
<p>1 know, the 21st, 22nd, 23rd, 24th -- so 2 for a couple of weeks you said nothing 3 about that?</p> <p>4 A. No.</p> <p>5 Q. You didn't say it to your 6 parents, either?</p> <p>7 A. No.</p> <p>8 Q. You mentioned that when you 9 spoke to Mr. Clymer, that you didn't 10 think he would believe you. Do you 11 remember testifying to that?</p> <p>12 A. Yes.</p> <p>13 Q. Why did you have that feeling?</p> <p>14 A. Because, first of all, I had 15 deleted everything and I was just 16 embarrassed by what was happening.</p> <p>17 Q. So, if I'm understanding you 18 correctly, you didn't think he would 19 believe you because you were embarrassed?</p> <p>20 A. I had no proof of anything.</p> <p>21 Q. Do you want to take a break?</p> <p>22 A. No.</p> <p>23 Q. You mentioned that you were 24 best friends with Chelsea Romig. Did</p>	<p>1 Q. Would you have generally spoken 2 to her every day?</p> <p>3 A. Yes.</p> <p>4 Q. In any way, shape or form, 5 whether by text or talking on the phone 6 or in person?</p> <p>7 A. Yes.</p> <p>8 Q. And do you think over the 9 Christmas break you tried to reach out to 10 her?</p> <p>11 A. I don't recall.</p> <p>12 Q. Do you have a memory of ever 13 trying to reach out to her again after 14 your meeting with Mr. Clymer?</p> <p>15 A. I think I did. I don't know. 16 I don't recall if I did or when I did.</p> <p>17 Q. You're saying that she never 18 spoke to you again.</p> <p>19 A. Correct.</p> <p>20 Q. Fair to say that you never 21 spoke to her again, either?</p> <p>22 A. I don't recall.</p> <p>23 Q. This meeting that Coach Landis 24 arranged with you and Chelsea Romig, was</p>	Page 137

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1	that in relation to the beginning of the 2 school following the Christmas break? 3 A. Maybe the first practice back. 4 Q. So, school was back in session. 5 A. Yes. 6 Q. And at the first practice the 7 coach sat you down, sat Chelsea Romig 8 down. What did the coach say? 9 A.I don't recall what she said. I 10 just remember that it was kind of a 11 meeting to get us to talk and work out 12 the situation. 13 Q. So, is it fair to say you have 14 a memory that she at least asked the two 15 of you to talk to each other? 16 A. Yes. 17 Q. Did the two of you talk to 18 each other? 19 A. I don't believe she talked to 20 me. 21 Q. "She "being Chelsea Romig. 22 A. Yes. 23 Q. Did you talk to her? 24 A. Yes.	1 Q. Do you know where in Georgia? 2 A. No. 3 Q. Do you speak with him? 4 A. I haven't spoken to him since I 5 got married. Maybe every four months. 6 Q. Do you know what town he lives 7 in? 8 A. No, I don't. 9 Q. Do you know his phone number? 10 A. I could probably get it for 11 you. 12 Q. Would you do that? Do you 13 recall at the beginning -- 14 MR. GROTH: Hold on a second. 15 MR. KEMETHER: I'm sorry. I 16 didn't know she was doing that right now. 17 THE WITNESS: Do you want me to 18 wait? 19 MR. KEMETHER: No. If you have 20 it, I'll take it. That's great. 21 THE WITNESS: 215-390-8600. 22 MR. KEMETHER: Thank you. Is 23 that a work number? 24 THE WITNESS: I believe that's		
1	Q. What did you say to her? 2 A. I don't remember much of the 3 conversation other than "I'm sorry." 4 Q. So, your memory is that you 5 said you're sorry to Chelsea Romig and 6 Chelsea Romig said, to the best of your 7 memory, nothing. 8 A. No, sir. 9 Q. How long did the meeting last? 10 A. Maybe ten minutes. 11 Q. Anything else happen in those 12 ten minutes that we haven't talked about? 13 A. No. 14 Q. Did Coach Landis say anything 15 else? 16 A. Not that I recall. 17 Q. Did you ever tell Eric Romig to 18 stop doing what he was doing? 19 A. I don't recall. 20 Q. What's your biological father's 21 name? 22 A. Phil Mayer. 23 Q. Do you know where he lives? 24 A. Georgia.	Page 139	1 his cell phone. 2 MR. KEMETHER: Thank you. 3 BY MR. KEMETHER: 4 Q. Do you recall at the beginning 5 of both your junior and senior year being 6 given a student handbook at Faith 7 Christian? 8 A. No. 9 Q. Do you recall being given any 10 instructions about what you were to do in 11 the event that somebody was sexually 12 harassing you? 13 A. No. 14 Q. What was your attendance history 15 like in your junior year in high school? 16 A. Good, I think. 17 Q. Good? How about in your senior 18 year? 19 A. My senior year I had mono, so 20 I know I missed a couple of weeks. 21 Q. For what period of time did you 22 have mono? 23 A. I don't know. 24 Q. Was it in the fall, the winter,	Page 141

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1	the spring?	1 you why that was the case?
2	A. I don't know.	2 A. No.
3	Q. I'm sorry?	3 Q. And it stopped after a couple
4	A. I don't know. Sorry.	4 weeks?
5	Q. Are you aware if your parents	5 A. Yes.
6	ever thanked Mr. Clymer for the way he	6 Q. They started talking to you
7	handled the situation with you and Mr.	7 again?
8	Romig?	8 A. Yes.
9	A. I'm sorry, thanked him?	9 Q. Did anyone explain to you why ..
10	Q. Are you aware if your parents	10 the people started talking to you again?
11	ever thanked Mr. Clymer for the way he	11 A. No.
12	handled the situation between you and Mr.	12 Q. You mentioned something about
13	Romig?	13 the girls in the games not passing the
14	A. I don't know.	14 ball to you?
15	Q. Would you be surprised if that	15 A. Correct.
16	were true?	16 Q. Was that an issue with the
17	A. Yes.	17 coach, whoever was coaching the team at
18	Q. If I'm understanding correctly,	18 that point?
19	Mr. Romig's improper behavior towards you	19 A. I don't believe so.
20	was entirely via text except for the one	20 Q. Did you ever say anything to
21	time where he touched your butt.	21 the coach about that?
22	A. Correct.	22 A. I don't think so.
23	Q. And he touched your butt with	23 Q. Did the coach ever say anything
24	his hands?	24 to you about that?
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1	A. Correct.	1 A. No.
2	Q. Never did anything inappropriate	2 Q. Did the coach ever say anything
3	with you in person?	3 to the team about that?
4	A. No.	4 A. I don't believe so.
5	Q. Aside from touching your butt.	5 Q. When is the last time you
6	A. No.	6 communicated with Robin Landis?
7	Q. Never did anything inappropriate	7 A. She was at my wedding in May.
8	with you on the phone.	8 MR. RUSSELL: Did you say "in"
9	A. No.	9 or "at"?
10	Q. You mentioned that the girls on	10 THE WITNESS: She was at my
11	the team after Christmas break, after	11 wedding.
12	Coach Romig was no longer coaching the	12 BY MR. KEMETHER:
13	team, were not treating you the same way.	13 Q. Was she in your wedding party?
14	A. That's correct.	14 A. No.
15	Q. Did you remain as a co-captain	15 Q. What would you describe your
16	of the team?	16 relationship with her to be now?
17	A. Yes.	17 A. I don't talk to her very often.
18	Q. And did I hear you say they	18 I mean, I'm friends with her daughter,
19	basically stopped talking to you?	19 so...
20	A. For a while, yes.	20 Q. Did you invite her to the
21	Q. For a while. For how long a	21 wedding?
22	period?	22 A. Yes.
23	A. A couple of weeks.	23 Q. Is she your friend?
24	Q. And did someone ever explain to	24 A. Yes.

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1	Q. Weddings, sometimes the groom 2 invites people, sometimes the bride does. 3 Did you invite her? 4 A. Yes. 5 MR. KEMETHER: Those are all 6 the questions I have for now, but I'm 7 sure there will be some others. Thanks 8 for your time. 9 MR. SANTARONE: Ms. Mayer, I 10 just have some follow-up questions. 11 EXAMINATION 12 BY MR. SANTARONE: 13 Q. When you left Upper 14 Pekriomen -- and I understand you don't 15 want to talk about some of the issues 16 that arose at Upper Pekriomen -- was 17 there any interview process at Faith 18 Christian Academy before you went there? 19 A. No. 20 Q. Do you know what, if anything, 21 Faith Christian Academy knew about 22 whatever issues there were at Upper 23 Pekriomen? 24 A. No. And to clarify, they	1 through text messages that Chelsea Romig 2 told you she had been sexually abused as 3 a child? 4 A. That's correct. 5 Q. How did that conversation come 6 up with Mr. Groth when you met with him? 7 A. To be honest, I don't remember. 8 Q. Do you remember discussing it 9 with him, though? 10 A. Yes. 11 Q. And in what context? Did he ask 12 you everything you knew about Chelsea? I 13 mean, how did it come up? 14 A. I don't remember. 15 Q. And how many text messages did 16 you exchange with Chelsea on this topic? 17 A. Very few. It was not talked 18 about very much. 19 Q. And what led to it coming up 20 at all? Did something happen or did some 21 event happen that -- 22 A. I don't remember. 23 Q. You talked about, when you were 24 at Calvary Baptist, you went there from
1	Page 147	Page 149
2	weren't really issues. They were just, 3 for me, decisions I didn't find were right. 4 Q. Did any of these decisions that 5 you were making that weren't right, did 6 any of those decisions, was that known to 7 Upper Pekriomen, the school? 8 A. No. 9 Q. Did it involve any police 10 involvement? 11 A. No. 12 Q. When you were the co-captain of 13 the team -- do the players vote for the 14 co-captains? 15 A. I believe so. 16 Q. So, when you came back -- in 17 your senior year you were voted as 18 co-captain. 19 A. Yes. 20 Q. Was it something where all 21 seniors were co-captains, or were there 22 people that weren't? 23 A. No, I was the only senior. 24 Q. Okay. You talked about learning	1 fourth to ninth grade? 2 A. Correct. 3 Q. And you felt like you were an 4 outsider. Did your parents get divorced 5 while you were at that school, or had 6 they been divorced before that? 7 A. They had been divorced before 8 that. 9 Q. So, ever since you started at 10 Calvary Baptist your stepfather was with 11 you, Kevin Smith. 12 A. Yes. 13 Q. Did you ever see any list of 14 the number of text messages that were 15 exchanged between you and Mr. Romig? 16 A. I know that my parents have 17 documentation of that, but I've never sat 18 down and looked at it. 19 Q. Okay. Do you know whether or 20 not, looking at that, you would be able 21 to see how many text messages he sent to 22 you as opposed to how many text messages 23 you sent to him? 24 A. If I look at it? Potentially.

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<p>1 I don't recall a lot of that.</p> <p>2 Q. Generally, were the test</p> <p>3 messages reciprocal -- that is, he would</p> <p>4 send you messages and you would respond</p> <p>5 back -- or did he text-message you much</p> <p>6 more than you text-messaged him?</p> <p>7 A. He texted me a lot more than I</p> <p>8 texted him.</p> <p>9 Q. Are you able to give a</p> <p>10 percentage? You know, say an average of</p> <p>11 one hundred text messages, how many you</p> <p>12 sent and how many he sent?</p> <p>13 A. Maybe for every three or four I</p> <p>14 would send one. I don't know if that</p> <p>15 helps you.</p> <p>16 Q. That helps. In the meeting</p> <p>17 that you had with Mr. Clymer, you said</p> <p>18 that he didn't ask to see the phone?</p> <p>19 A. No.</p> <p>20 Q. Had you told him you had</p> <p>21 deleted all the messages off the phone?</p> <p>22 A. I don't recall.</p> <p>23 Q. Between the time that you left</p> <p>24 Mr. Clymer's office to when you arrived</p>	<p>1 A. Yes.</p> <p>2 Q. But you don't know whether</p> <p>3 there was a 12:00 dismissal that day?</p> <p>4 A. I don't believe there was just</p> <p>5 because I remember there was a practice</p> <p>6 that day.</p> <p>7 Q. Okay. And Mr. Clymer said that</p> <p>8 he thought you should leave the school</p> <p>9 for your safety. That's what you</p> <p>10 testified to, correct?</p> <p>11 A. Correct.</p> <p>12 Q. And Mr. Clymer told you to go</p> <p>13 home and tell your parents.</p> <p>14 A. Yes.</p> <p>15 Q. And you did that.</p> <p>16 A. Yes.</p> <p>17 Q. And after that meeting that you</p> <p>18 had with Mr. Clymer that day, you got no</p> <p>19 more text messages from Mr. Romig other</p> <p>20 than the one that your parents have a</p> <p>21 copy of, correct?</p> <p>22 A. Correct.</p> <p>23 Q. And have you ever seen that</p> <p>24 text message?</p>	Page 153
<p>1 home and told your parents, had you</p> <p>2 deleted any messages during that time</p> <p>3 frame?</p> <p>4 A. I don't believe so, no -- I</p> <p>5 don't know if I had even received a text</p> <p>6 from him.</p> <p>7 Q. Okay. So, if Mr. Clymer had</p> <p>8 looked at your phone on that day, it</p> <p>9 wouldn't have been anything different than</p> <p>10 what your parents saw on the phone,</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. You were asked some questions</p> <p>14 about the meeting that you had with Mr.</p> <p>15 Clymer and that it could have been the</p> <p>16 last day of school before the Christmas</p> <p>17 break?</p> <p>18 A. It can have been, yes.</p> <p>19 Q. Did class let out early on that</p> <p>20 last day before the Christmas break?</p> <p>21 A. I don't know.</p> <p>22 Q. And your meeting would</p> <p>23 have been first thing in the morning</p> <p>24 because -- was it after homeroom?</p>	<p>1 A. I saw it, yes. I don't</p> <p>2 remember -- it was very random, something</p> <p>3 about --</p> <p>4 Q. It doesn't seem like it's</p> <p>5 addressed to you, does it? It doesn't</p> <p>6 make sense.</p> <p>7 A. Correct.</p> <p>8 Q. So, the inappropriate text</p> <p>9 messages, they stopped -- you never got</p> <p>10 any after you met with Mr. Clymer.</p> <p>11 A. Correct.</p> <p>12 Q. When you sat down and you typed</p> <p>13 this out -- you said that you came home,</p> <p>14 you talked to your parents, your dad said</p> <p>15 to sit down and type this out?</p> <p>16 A. Yes.</p> <p>17 MR. RUSSELL: Just for the</p> <p>18 record, we're talking about exhibit six?</p> <p>19 MR. GROTH: Yes, second page,</p> <p>20 Romig exhibit six.</p> <p>21 BY MR. SANTARONE:</p> <p>22 Q. You don't have in here anywhere</p> <p>23 at all that Mr. Romig ever touched you.</p> <p>24 A. I don't, no. But I mean, at</p>	Page 153

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1	that time there was so much that I was	1 A. Yes.
2	processing through.	2 Q. Did you go to the emergency
3	Q. Sure. But before you met with	3 room?
4	the detectives in 2013, up until then you	4 A. Yes.
5	had never told your parents that Mr.	5 Q. And how was it you got the
6	Romig had touched you, did you?	6 concussion?
7	A. I think I did. I don't know.	7 A. I was going for a ball, so
8	Q. Do you remember when you did?	8 with another player we hit heads.
9	A. No.	9 Q. In a practice?
10	Q. You never told the school --	10 A. In a game.
11	you never told Mr. Clymer that Mr. Romig	11 Q. You mentioned in the document
12	had ever touched you.	12 we looked at before --
13	A. I don't believe so.	13 MR. SANTARONE: What was it
14	Q. Okay. You talk about you had	14 marked, Romig-6?
15	a concussion and you weren't practicing.	15 MR. GROTH: Yes.
16	Do you remember what year it was that you	16 BY MR. SANTARONE:
17	had the concussion? Was it your junior	17 Q. (Continuing) -- about Mr. Romig
18	year or senior year?	18 not liking pictures on your cell phone.
19	A. It was my senior year.	19 Do you know when he would have seen your
20	Q. Do you remember, was it before	20 cell phone?
21	the season started or after the season	21 A. No.
22	started?	22 Q. Did you ever forward him any
23	A. After the season started.	23 pictures at all?
24	Q. So, the season starts in	24 A. No.
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1	November, is when practice starts, right?	1 Q. He never asked you to forward
2	A. Correct.	2 any pictures, did he?
3	Q. And therefore your first game	3 A. No.
4	is maybe late November?	4 Q. During that time after the
5	A. Yes.	5 Christmas break, did you have any sense
6	Q. And you had a concussion where	6 as to how often or if at all your
7	you missed some games during that period?	7 parents were talking to Mr. Clymer?
8	A. I believe one or two games,	8 A. I know my mom had reached out
9	yes.	9 to him once and I believe got his
10	Q. Did you go to a doctor for the	10 voice-mail. It was very difficult for
11	concussion?	11 them to get ahold of him.
12	A. Yes.	12 Q. Do you know whether it was
13	Q. Who did you go to?	13 because he was out of the country,
14	A. I think Grandview Hospital.	14 because he was away -- or out of the
15	Q. Did they have like a concussion	15 state, rather?
16	protocol you had to go through where they	16 A. I don't know.
17	check you again?	17 Q. Did you ever have any
18	A. Did I go again after the	18 discussion at all with your parents about
19	initial visit?	19 notifying the police?
20	Q. Yes.	20 A. They had wanted to, yes, but I
21	A. I don't believe so.	21 think at the same time they were
22	Q. But instead of going to a	22 depending on the school to handle this
23	family doctor, you went to Grandview	23 and I -- I just wanted to play
24	Hospital?	24 basketball, so...

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1	<p>Q. Right. Do you know if they ever, once they learned that the police had been contacted, whether they talked about contacting the police on their own?</p> <p>A. I don't know.</p> <p>Q. If there came a time between November/December of 2009 and the time you talked to the detectives, if your parents had learned that you said that Mr. Romig had touched you, do you remember any discussion then "Maybe we should call the police"?</p> <p>A. No.</p> <p>Q. This issue about the banquet or some event where you were caught drinking, were there any other students that were caught drinking with you?</p> <p>A. Yes.</p> <p>Q. What happened to those students? Were any of them asked to leave the school?</p> <p>A. They kind of got the same deal I did. I think two of them left and I believe the one other stayed.</p>	<p>A. No.</p> <p>Q. Do you remember verbatim what he said?</p> <p>A. No.</p> <p>Q. Do you know whether he was talking about he didn't send any text messages or that he didn't send any inappropriate text messages?</p> <p>A. I don't remember.</p> <p>Q. It could have been either one.</p> <p>A. Correct.</p> <p>Q. You talked about there was a game where Mr. Romig was sitting on the chairs and he was about twenty or thirty feet away from you, a complaint was made and then that didn't happen any more, correct?</p> <p>A. Correct.</p> <p>Q. And you said he was sitting in a cubby or --</p> <p>A. It's just kind of like a cove in the wall that's right next to the bench or chairs.</p> <p>Q. Is it where a spectator could</p>
1	Page 159	Page 161
2	<p>Q. Did the one that stayed have to go to the counseling sessions?</p> <p>A. Yes.</p> <p>Q. Do you know who that was?</p> <p>A. Devin Brenner.</p> <p>Q. And how many of these counseling sessions with Ron Jones did you have to go to? Do you remember?</p> <p>A. Five?</p> <p>Q. The phone conversation that you said you overheard while you were waiting to see Ron Jones, you said, when asked about it a second time, that Romig denied sending you the text messages?</p> <p>A. Correct.</p> <p>Q. So, of this whole conversation you don't recall anything, what you could hear, but you remember hearing that?</p> <p>A. Yes.</p> <p>Q. Do you know if that was in response to a question?</p> <p>A. I don't remember.</p> <p>Q. So, you don't know what led to that.</p>	<p>sit?</p> <p>A. Yes.</p> <p>Q. And his daughter's playing in the game, correct?</p> <p>A. Yes.</p> <p>Q. He's not sitting at any game that his daughter's not playing in, correct?</p> <p>A. Correct.</p> <p>Q. And Coach Forker, is it?</p> <p>A. Yes.</p> <p>Q. He had never raised an issue with the team about, hey, you're not passing the ball to Emily?</p> <p>A. No.</p> <p>Q. Was he a good coach?</p> <p>A. Yes.</p> <p>Q. And in your meetings with Mr. Groth, other than the letter and the subpoena, did he ever show you any other documents?</p> <p>A. No.</p> <p>Q. You've never seen the complaint that was filed in this case?</p>

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1	A. I don't believe so.	1 Q. When you left Ryan Clymer's
2	Q. Have you seen any detective	2 office, did you speak with Cheryl
3	records or police records of anything the	3 Alderfer?
4	police did?	4 A. No.
5	A. No.	5 Q. So, where did she go after the
6	Q. Even after you graduated --	6 meeting?
7	well, leading up to your graduation the	7 A. I believe when I left she was
8	rest of that school year and after that,	8 still in the office. I don't recall.
9	do you know if your parents ever told	9 Q. Oh, she stayed in the office....
10	Faith Christian Academy that they thought	10 A. I don't recall.
11	they didn't handle the situation right?	11 Q. Now, you mentioned that Robin
12	A. I don't believe so.	12 Landis at some point apologized to you.
13	MR. SANTARONE: That's all I	13 A. Yes.
14	have.	14 Q. Do you know when that occurred?
15	Thank you.	15 A. It was the end of the season.
16	MS. CONNOR: I have a few	16 I mean, it was still -- I was still in
17	questions.	17 school when it happened.
18	EXAMINATION	18 Q. So, the end of the 2010 school
19	BY MS. CONNOR:	19 year, like the 2009/2010 school year,
20	Q. Emily, I've already introduced	20 sometime at the end.
21	myself. I just have a few questions for	21 A. Yes.
22	you.	22 Q. And what did she apologize for?
23	With regard to texting,	23 A. For not believing me.
24	typically one person starts texting and	24 Q. Did she tell you why she now
	Page 163	Page 165
1	the other person responds. Were there	1 believed you?
2	times in November and December when you	2 A. No.
3	initiated a texting chain with Mr. Romig?	3 Q. Now, the records that your
4	A. No.	4 step-dad provided to Faith Christian
5	Q. So, you're saying that you	5 Academy, the phone records appear to
6	would never have initiated texting.	6 indicate that there was a text message
7	A. No.	7 from Eric Romig's phone at 3:33 on
8	Q. You would always receive a text	8 December 21st, 3:33 in the afternoon.
9	from him and then respond.	9 Do you recall receiving a text
10	A. Correct.	10 message after you left Mr. Clymer's office
11	Q. Okay. What is your date of	11 from Eric Romig?
12	birth?	12 A. Yes. That was the one weird
13	A. 12/29/91.	13 text message that I had received.
14	Q. Were you ever suspended from	14 Q. Well, actually that weird test
15	Upper Pekriomen?	15 message was on December 22nd, wasn't it?
16	A. No.	16 It was the next morning.
17	Q. Did you ever talk to Lauren	17 A. I don't know.
18	Fretz or Kristen Kennedy about the	18 Q. So, you don't recall receiving
19	situation with Eric Romig?	19 a text message from Eric Romig after you
20	A. No.	20 left Ryan Clymer's office.
21	Q. On the day that you had your	21 A. No.
22	meeting with Ryan Clymer, how did you get	22 Q. Okay. Do you know if you
23	home from school that day?	23 would have saved that message?
24	A. I drove.	24 A. No.

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1	MR. KEMETHER: No, you don't	1 Q. You thought you could speak
2	know if you would have, or you did not?	2 with them if something was going on,
3	THE WITNESS: I would not have	3 though? Were they approachable or
4	saved it, no.	4 unapproachable?
5	BY MS. CONNOR:	5 A. They were approachable, but I
6	Q. Is there any particular reason	6 didn't feel I could share it with anyone.
7	why you would have deleted that message?	7 Q. How about now? Is it better or
8	A. The message on my way home?	8 worse now?
9	Q. Right.	9 A. Better.
10	A. No. I don't recall receiving	10 Q. Better now, okay. And how
11	one. I don't...	11 would you describe, in your own words,
12	Q. But you think you deleted it if	12 how FCA and Ryan Clymer handled the
13	you did receive it.	13 investigation into the texting issue
14	A. Definitely, yes.	14 between you and Mr. Romig? What words
15	Q. And you don't know why you	15 would you use to describe it?
16	would have deleted that.	16 A. I wish they would have handled
17	A. I didn't save any test messages	17 it differently.
18	from him.	18 Q. How so?
19	Q. Thank you.	19 A. I wish that they would have
20	MS. CONNOR: I don't have any	20 followed through with actually contacting
21	other questions.	21 the authorities.
22	EXAMINATION	22 Q. So, you wish they would have
23	BY MR. RUSSELL:	23 contacted the police or Children & Youth?
24	Q. I apologize if it sounds like	24 A. Correct.
	Page 167	Page 169
1	we're covering some of the same rounds.	1 Q. Do you know why your parents
2	I don't want to, but there are some	2 didn't contact the police?
3	subtle nuances that I want to go through.	3 A. Because they were told by Ryan
4	I introduced myself. I'm	4 Clymer that he was going to be doing
5	Jonathan Russell. I represent Faith as	5 that.
6	well as Ryan Clymer as well as Russ	6 Q. When nothing happened, when they
7	Hollenbach. And the reason why we're here	7 didn't hear from anybody, did they inquire
8	is because we're trying to look back and	8 further as to whether he contacted the
9	see what happened at that time based upon	9 police or Children & Youth?
10	the lawsuit that's been brought against	10 A. Not to my knowledge. And
11	Faith by Attorney Groth and his client.	11 again, as I mentioned, I just wanted to
12	So, it's a little bit	12 play basketball. I didn't feel like
13	difficult. We know what we now know, but	13 having to deal with this, so...
14	we're going to go back and try and figure	14 Q. Do you know whether your
15	out what did we know then, and that's why	15 parents felt that they believed you? Did
16	we're asking you some of these questions.	16 they communicate that they believed you?
17	Nobody wants to send you through the	17 A. Yes.
18	ringer on this, but I understand that	18 Q. Did they say they believed you
19	some may be difficult to work through.	19 about the sexual content of these
20	Back in 2009/2010, Ms. Mayer,	20 messages?
21	how would you describe your relationship	21 A. Yes, ma'am.
22	with your mother and your step-father?	22 Q. One concern was, we were able
23	A. A normal teenager/parent	23 to -- they were able to establish the
24	relationship.	24 volume of messages, right?

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1	A. Yes.	1 A. I believe I learned that
2	Q. They just couldn't ascertain the	2 through my conversations Mr. Groth.
3	content of those messages, correct?	3 Q. Did you ever tell Ryan Clymer
4	A. Correct.	4 that you believed Lauren Fretz was coming
5	Q. And you talked about -- you	5 home on a particular weekend to have sex
6	were concerned that no one would believe	6 with Eric Romig?
7	you, right?	7 A. I don't recall.
8	A. Yes.	8 Q. Does that refresh your
9	Q. And that's why I didn't really	9 recollection at all, that comment, or hear
10	understand, how come you deleted the	10 something like that?
11	messages as opposed to hanging onto them?	11 A. Could you repeat it, please?
12	Because then they would really believe	12 Q. Did you ever tell Ryan Clymer
13	you, if you had them. Why did you	13 that you believe Lauren Fretz was coming
14	delete the messages?	14 home from college on a particular weekend
15	A. Well, I think I was -- I was	15 to have sex with Eric Romig?
16	in shock, kind of, when it first started	16 A. I don't recall ever telling
17	happening. I didn't know what to do. And	17 that to Ryan Clymer, but I remember Mr.
18	then again, Chelsea is his daughter, so I	18 Romig saying that to me.
19	think I was just kind of in denial for a	19 Q. Did you know that Ms. Fretz was
20	while.	20 also contacted by the police as part of
21	Q. Did you ever tell your parents	21 that investigation as well?
22	not to contact the police because you	22 A. Yes.
23	just wanted to play basketball?	23 Q. And did you learn that she told
24	A. I did.	24 the same thing to the detectives, the
	Page 171	Page 173
1	Q. Do you know if your parents	1 police investigating this matter involving
2	felt that Ryan was responsive to their	2 Ms. Nace, as she told to Ryan Clymer?
3	comments? Did he ever tell you that one	3 Did you ever hear that?
4	way or the other?	4 A. No.
5	A. He was not responsive to them.	5 Q. Did Ryan Clymer or your parents
6	Q. And did they tell you that, or	6 ever tell you that Mr. Clymer contacted
7	that was your impression?	7 Kristen Kennedy as part of his
8	A. That was my impression.	8 investigation?
9	Q. Did they ever talk to you	9 A. No.
10	about -- once they got involved, did they	10 Q. So, you never knew that until I
11	ever communicate to you about what the	11 just told that you?
12	investigation revealed?	12 A. No.
13	A. No.	13 Q. Did you ever learn through your
14	Q. For instance, did your parents	14 parents or through Mr. Clymer that he
15	ever share with you that Ryan spoke	15 contacted a police officer?
16	directly with Lauren Fretz?	16 A. Can you repeat that?
17	A. I don't believe my parents	17 Q. Sure: Did you ever learn
18	mentioned that to me.	18 through your parents or through Ryan
19	Q. Did you ever find out at any	19 Clymer that as part of his investigation
20	time that Ryan had contacted Lauren Fretz?	20 he contacted a police officer?
21	A. I don't believe so.	21 A. He said he would, but he never
22	Q. Did you ever learn that Lauren	22 did.
23	Fretz denied ever having a sexual	23 Q. He never told you or he never
24	relationship with Eric Romig?	24 contacted --

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1	<p>A. He never told me that, no.</p> <p>Q. Do you know whether he told your parents that?</p> <p>A. I don't know.</p> <p>Q. Did you learn through your parents, through Mr. Clymer or even through Attorney Groth that he contacted former players and the assistant coach, Robin Landis, as part of his investigation into this matter?</p> <p>A. I don't.</p> <p>Q. You don't recall?</p> <p>A. No.</p> <p>Q. Or he didn't.</p> <p>A. I don't recall.</p> <p>Q. Did you ever learn through anyone, whether it be through Ryan Clymer, whether it be through your parents, whether it be through Attorney Groth when he met with you on those two days, that as part of his investigation Ryan Clymer spoke with Eric Romig's wife about these texts in particular?</p> <p>A. That he said face-to-face --</p>	<p>1 as part of his investigation?</p> <p>2 A. Sorry.</p> <p>3 Q. That's all right.</p> <p>4 MR. GROTH: Do you want to</p> <p>5 take a couple minutes and go out to the</p> <p>6 ladies room, get some air?</p> <p>7 THE WITNESS: Yes.</p> <p>8 (A brief recess was taken)</p> <p>9 MR. RUSSELL: We're back on the</p> <p>10 record.</p> <p>11 (The record was read by the</p> <p>12 court reporter as requested)</p> <p>13 BY MR. RUSSELL:</p> <p>14 Q. Is there anyone else that you</p> <p>15 believe that Ryan Clymer should have gone</p> <p>16 to as part of his investigation?</p> <p>17 A. I don't think so.</p> <p>18 Q. And you talked during your</p> <p>19 deposition about feeling like you weren't</p> <p>20 believed, and I just want to look into</p> <p>21 that a little bit or explore it a little</p> <p>22 bit further.</p> <p>23 They believe the number the</p> <p>24 texts that were sent between you were</p>
1	<p>Q. Either on the phone or face-to-face.</p> <p>A. I don't know.</p> <p>Q. Did you ever hear any information that Eric Romig's wife indicated to Mr. Clymer that some of these texts were for her?</p> <p>A. Sorry, but can you repeat that?</p> <p>Q. Sure: Did you ever hear from anyone, whether it be Ryan Clymer, whether it be through your parents, whether it be through detectives, whether it be through Attorney Groth, that Mrs. Romig at the time, Eric Romig's wife, indicated that some of the texts that were identified as being inappropriate she said were intended for her?</p> <p>A. I just learned that through the email I read.</p> <p>Q. But prior to today you never heard that.</p> <p>A. No.</p> <p>Q. Was there anyone else that you believe Ryan Clymer should have spoken to</p>	<p>1 inappropriate, right?</p> <p>2 A. Yes.</p> <p>3 Q. And you were brought back on</p> <p>4 the team and you were co-captain.</p> <p>5 A. Yes.</p> <p>6 Q. And Mr. Romig was no longer</p> <p>7 coaching the team.</p> <p>8 A. Right.</p> <p>9 Q. Doesn't that indicate that they</p> <p>10 believed you?</p> <p>11 A. Yes.</p> <p>12 MR. GROTH: Just note my</p> <p>13 objection to the form of that question, please.</p> <p>14 BY MR. RUSSELL:</p> <p>15 Q. I think you said you don't</p> <p>16 recall ever telling Mr. Romig to stop</p> <p>17 texting you, right?</p> <p>18 A. Correct.</p> <p>19 Q. In the texts that you sent back</p> <p>20 to Mr. Romig, did they contain things</p> <p>21 other than discussions about basketball?</p> <p>22 A. Yes. Occasionally I would text</p> <p>23 him back. I mean, there is an example in</p>

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<p>1 here. He would say something to me and 2 I would say why or okay.</p> <p>3 I don't recall ever texting him 4 back where it was like I wanted to have 5 this conversation with you.</p> <p>6 Q. Like asking him a question.</p> <p>7 A. Correct.</p> <p>8 Q. Okay.</p> <p>9 A. Well, this is a question in 10 there, so...</p> <p>11 Q. You talked about why?</p> <p>12 A. Yes.</p> <p>13 Q. And by "there," just for the 14 record, we're referring to the list that 15 was generated as part of Romig six 16 attached to page two.</p> <p>17 Do you know if Chase ever met 18 separately with Mr. Clymer?</p> <p>19 A. I don't believe he did until 20 after.</p> <p>21 Q. Let me back up. When I say 22 "met with him," I mean met with him about 23 this situation, the texting situation. You 24 don't believe he met until after what?</p>		<p>1 deal with it then.</p> <p>2 Q. So, your mom or your dad would 3 know what happened with that. You don't 4 have any knowledge.</p> <p>5 A. Correct.</p> <p>6 Q. But you do remember them saying 7 that they were going to try to get the 8 actual content, and then were they going 9 to go back and disclose that to Ryan?</p> <p>10 A. Yes. And when they couldn't, 11 that's when they made up that document of 12 text messages, how many he sent and how 13 many I sent.</p> <p>14 Q. They were able to get the 15 volume.</p> <p>16 A. Yes.</p> <p>17 Q. Do you believe that Ryan Clymer 18 or Faith Christian Academy should have 19 done something more than what they did as 20 a result of their investigation?</p> <p>21 A. Yes.</p> <p>22 Q. What do you believe that they 23 should have done?</p> <p>24 A. I believe they should have</p>
<p>1 A. After I had gone to...</p> <p>2 Q. To meet with Mr. Clymer.</p> <p>3 A. Yes.</p> <p>4 Q. But it was within that same 5 time period before Mr. Romig didn't return 6 to the team?</p> <p>7 A. I believe so.</p> <p>8 Q. Did you ever meet together with 9 Chase and Mr. Clymer?</p> <p>10 A. No.</p> <p>11 Q. Do you know if your mom or 12 your dad ever told Mr. Clymer that they 13 were going to try to obtain the actual 14 content of the texts?</p> <p>15 A. They did.</p> <p>16 Q. They told him that?</p> <p>17 A. Yes.</p> <p>18 Q. And did they take any steps to 19 try to do that?</p> <p>20 A. I believe so.</p> <p>21 Q. What was your understanding of 22 what happened?</p> <p>23 A. I don't know. I wasn't really 24 involved. Again, I didn't care to even</p>	Page 179	<p>1 actually gone to the authorities.</p> <p>2 Q. And you said your parents 3 didn't because you told them not to.</p> <p>4 A. Correct.</p> <p>5 Q. Did you ever tell Ryan not to?</p> <p>6 A. No.</p> <p>7 Q. The reason that you told your 8 parents not to, would that have been the 9 same reason, though, that you wouldn't 10 want Ryan not to go to the police?</p> <p>11 A. Yes, it would have been the 12 same reason, but I would not have stopped 13 him in this case.</p> <p>14 Q. After this incident occurred, 15 you continued to attend Faith Christian 16 Academy.</p> <p>17 A. Yes.</p> <p>18 Q. Was there anything that 19 prevented you from going to a different 20 school?</p> <p>21 A. No.</p> <p>22 Q. Was there anything that 23 prevented from you being home-schooled?</p> <p>24 A. No.</p>

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1	Q. Anything that prevented you from 2 being a part of a cyber-school?	1 of sexual exploitation?
3	A. No.	2 A. No.
4	Q. In 2009 and 2010, during the 5 period of this investigation, did you ever 6 tell your parents or Ryan Clymer that you 7 were touched inappropriately by Mr. Romig?	3 Q. At any time in 2009 or 2010 4 did you believe that Mr. Romig was 5 attempting to persuade you, induce you, 6 entice you or coerce you to engage in 7 sexually explicit conduct?
8	A. I believe I told my parents.	8 A. Yes.
9	Q. Did you ever tell Mr. Clymer?	9 Q. What did he do that gave you 10 that impression?
10	A. No.	11 A. The way he would send me text 12 messages; the way he would say things he 13 did with Lauren; and, you know, trying to 14 get me to do the same things that she 15 was doing with him.
11	Q. Why was that?	16 Q. And with regard to Lauren, you 17 don't know whether that actually ever 18 happened.
12	A. He never asked me any questions 13 about what even happened.	19 A. I don't know.
14	Q. And the only time that you're 15 saying that you believe you were touched 16 inappropriately was at that practice where 17 you had the concussion and he touched 18 your backside?	20 Q. Did you ever tell that to Mr.
19	A. That is the only time, yes.	21 Clymer?
20	Q. You had mentioned that you 21 believed it was intentional and not 22 inadvertent. What was the thought that 23 gave you that impression?	22 A. No.
24	A. Well, it wasn't like I just ran	23 Q. You never told him that you 24 thought that Mr. Romig was attempting to
	Page 183	Page 185
1	into him or he ran into me. He came over 2 and intentionally touched me.	1 persuade you, induce you, entice you or 2 coerce you to engage in some sort of 3 sexual activity?
3	Q. Did he like smack your backside 4 or pinch you or...	4 A. I was never asked.
5	A. More like a grab.	5 Q. But let me back up a little 6 bit. I think you testified in your 7 deposition that don't recall telling him 8 that the texts were sexual in nature. 9 You recall telling him that they were 10 inappropriate.
6	Q. When that happened, what did 7 you do?	11 A. Correct.
8	A. I just stepped away. I didn't 9 know what to do because my assistant 10 coach was right there and it was very 11 awkward.	12 Q. Is that accurate?
12	Q. But you didn't say "hey, watch 13 it" or "what was that" or no comment?	13 A. Yes.
14	A. No.	14 Q. But you have no recollection of 15 telling him anything about the sexual 16 aspect of these texts.
15	Q. And he made no comment at the 16 same time? He didn't say "excuse me" or 17 anything like that?	17 A. No.
18	A. No.	18 Q. No, you don't.
19	Q. At any time in 2009 or 2010, 20 did you believe you were the victim of 21 serious bodily injury?	19 A. No, I don't.
22	A. No.	20 Q. Was there anything else that 21 you wanted your parents to do that they 22 didn't do?
23	Q. At any time in 2009 or 2010 24 did you believe that you were the victim	23 A. No.
		24 Q. And you do believe that the

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1	school believed you regarding the volume 2 of texts that were exchanged between you 3 and Mr. Romig, correct?	1 that, would it have been your hope that 2 they would have told Mr. Clymer that?
4	A. Correct. 5 Q. Do you believe that your 6 parents believed you about the content of 7 those texts? 8 A. Yes. 9 Q. Did your mom or step-dad have 10 any kind words to say to Ryan at your 11 graduation? Do you recall that? 12 A. I don't believe they spoke. 13 Q. Since graduating, have you 14 spoken to anyone else about this texting 15 situation other than Mr. Groth and the 16 detectives? 17 A. No. 18 Q. When you went to see the 19 detectives in 2013, do you recall telling 20 them anything that was different than what 21 you had told Mr. Clymer or what you had 22 told your parents as evidenced in Romig-6? 23 A. No. 24 Q. The one thing -- and I think	2 A. Yes. 3 Q. Did you ever tell the police 4 officers that Mr. Romig had texted 5 comments about your backside in general? 6 A. Yes. 7 Q. Was that ever on Romig-6? 8 A. No. 9 Q. The second document that's 10 attached to that. 11 A. No. 12 Q. No? Is there a reason why you 13 didn't put texts about your physical 14 appearance of your backside in that 15 document? 16 A. No. 17 Q. Did you ever tell your parents 18 before you met with the detectives about 19 Mr. Romig sending you texts about the 20 character of your backside? 21 A. No. 22 Q. Also, there was an issue about 23 him wearing jeans. He texted you an
	Page 187	Page 189
1	it's been addressed -- there's no 2 indication in Romig-6, that document, that 3 there was any physical touching between 4 you and Mr. Romig, correct?	1 image. Was that the only image that was 2 ever texted?
5	A. Correct. 6 Q. So, if you did tell the police 7 officers at that time that he had touched 8 your backside, that would be different, 9 right? 10 A. Correct. 11 Q. Is there a reason why you 12 didn't put that in Romig-6, that list of 13 things? 14 A. No. 15 Q. Is there a reason why you 16 didn't tell Mr. Clymer that he had 17 inappropriately touched your backside? 18 A. Again, he never questioned me 19 on anything. 20 Q. How about your parents? Is 21 there a reason why you didn't tell your 22 presents that? 23 A. I think I did tell my parents. 24 Q. If you had told your parents	2 A. Yes. 3 Q. And that wasn't on Romig-6 -- I 4 think it's six. I keep referring to it. 5 But Romig-6, the document that you 6 prepared attached to that email, there was 7 no mention of him sending an image of him 8 in his jeans. Is that correct? 9 A. Correct. 10 Q. Do you know why you didn't put 11 that on that document? 12 A. No. 13 Q. Did you tell your parents that 14 he had sent you an image of his jeans? 15 A. Yes. 16 Q. Was it just from the waist 17 down? 18 A. It was like a mirror picture. 19 Q. So, it was a whole body? 20 A. Yes. 21 Q. Did you ever tell Ryan Clymer 22 or your parents that Mr. Romig told you 23 that he would like it if you changed on

	Page 190	Page 192
1	the bus like the other girls did?	1 A. About 9:30.
2	A. No.	2 Q. And the depositions were to
3	Q. You never told him that?	3 begin at 10:00?
4	A. It's written here, but I never	4 A. Correct.
5	verbally said that. I may have verbally	5 Q. And you believe he took notes
6	said to my parents through this, but...	6 of that deposition you had the first
7	Q. But I think on Romig-6 you	7 time?
8	talked about the Quakertown bus, right?	8 A. Yes.
9	A. Yes.	9 Q. And did he take notes the
10	Q. But did Mr. Romig ever say to	10 second time when he met with you?
11	you that he wanted you to change on the	11 A. I believe so.
12	bus with the basketball team?	12 Q. And that second time, that was
13	A. Yes, he did reference that via	13 to hand you the subpoena, to essentially
14	text with me.	14 serve you with the subpoena to appear
15	Q. Why was that not on Romig-6?	15 today at the deposition?
16	A. Because I said it here. It	16 A. Yes, if that's what that paper
17	was kind of the same -- thinking back, it	17 was.
18	was kind of the same conversation.	18 Q. Did you go to Eric Romig's
19	He was telling me that -- I	19 sentencing hearing?
20	believe that he was saying it was okay	20 A. No.
21	for me or all the other players to be	21 Q. Why was that?
22	doing that.	22 A. Because I never want to see him
23	Q. And were they doing that? Were	23 again.
24	they getting changed on the bus?	24 Q. At any of the meetings that you
	Page 191	Page 193
1	A. They weren't allowed to.	1 had with Mr. Groth, did he ever tell you
2	Q. So, nobody ever got changed on	2 that he knew of other girls at Faith
3	the bus at Faith Christian Academy?	3 Christian Academy who had some sort of
4	A. No.	4 alleged sexual relationship with Mr.
5	Q. That was something that he said	5 Romig?
6	was done at Quakertown.	6 A. We referenced two, what I had
7	A. Correct.	7 told him, about Lauren and Kristen.
8	Q. Did you ever tell Ryan Clymer	8 Q. How did you know something
9	that he said to you he would like to see	9 about Lauren and Kristen, though?
10	you get changed on the bus?	10 A. Because Eric Romig had told me
11	A. No. And again, Ryan Clymer	11 that.
12	never asked me any questions.	12 Q. What did he say about Kristen?
13	Q. You mentioned that you had two	13 A. That he would be sexual with
14	meetings with Attorney Groth before today.	14 her, same things as he did with Lauren.
15	Did he also meet with you today a little	15 Q. So, this was all coming to you
16	bit before our deposition?	16 from Mr. Romig.
17	A. Yes.	17 A. Correct.
18	Q. And what did you discuss at	18 Q. Did Mr. Groth ever tell you
19	that meeting?	19 that he had information about other girls?
20	A. Things similar to our second	20 A. No.
21	meeting, just how this was going to work,	21 Q. Did he ever tell you, Mr.
22	the kind of setting, under oath.	22 Groth, that he believed that FCA was
23	Q. What time did you get here	23 covering something up?
24	today?	24 A. No.

	Page 194	Page 196
1	Q. Do you have any information 2 that you believe FCA was covering 3 something up? 4 A. I mean, I know of past things, 5 but I don't know if that's what they're 6 covering up. 7 Q. What are the past things? 8 A. Situations that had happened 9 with Eric Romig's sister. I don't know... 10 how many years ago that was. 11 Q. And how did you know that? 12 A. I've known about it since 13 before he had contacted me, but I don't 14 remember how I heard of it. 15 Q. But what did you think Faith 16 was covering up about that? 17 A. Well, I don't know. Just what I 18 know is, it wasn't handled maybe the 19 right way. 20 Q. What is your impression or 21 understanding of how it was handled? 22 A. I don't have much knowledge of 23 that. 24 Q. It's just kind of an impression	1 two, I'm sorry, and it begins with 2 "Consequently." 3 It says, "Consequently, I would 4 ask that you call me as soon as possible 5 on my cell phone at 267-231-2170, day or 6 evening, so that I can explain to you in 7 more detail why I need your facts and 8 information." 9 . . . Did he explain to you to you... 10 why he needed your facts and information? 11 A. Yes. 12 Q. What did he say? 13 A. So that he could figure out 14 how -- like what they did in my situation 15 at the time. 16 Q. Did he say that your parents at 17 any time should have done something 18 different than what they did? 19 A. Mr. Groth? 20 Q. Yes. 21 A. No, he didn't. 22 Q. And then at the last sentence 23 in that paragraph it says "If I get 24 the" -- and this is the last full
1	that you have? 2 A. Yes. 3 Q. Do you know Elizabeth Nace? 4 A. No. 5 Q. Have you ever met her or her 6 parents? 7 A. No. 8 Q. In the letters that was sent to 9 you on April 10th, which has been marked 10 as Mayer number one, when you got that 11 letter what did you do? 12 A. My parents had sent it to me. 13 I was living in Langhorne at the time, so 14 my mom scanned it, emailed it to me, and 15 said we're doing this because it's the 16 right thing to do, basically. 17 Q. "Doing this" meaning contacting 18 Mr. Groth? 19 A. Yes; we would agree to meet 20 with him to go over... 21 Q. It says in the second paragraph 22 on this letter "I can explain to you to 23 you in more detail why I need your 24 facts" -- the first paragraph on page	1 paragraph before the salutation there, but 2 "If I get the impression from our 3 telephone conversation that you are not," 4 meaning truthful and forthcoming, I guess, 5 "I will have no alternative but to 6 immediately issue a subpoena to complete 7 your deposition testimony under oath on a 8 date of my choosing." 9 Did Mr. Groth notice your 10 deposition today? 11 A. Sorry? 12 Q. He's the one who gave you the 13 deposition notice today. 14 A. Yes. 15 Q. Did he ever tell you that he 16 got the impression that you were not 17 being truthful at all? 18 A. No. 19 Q. Did he tell you that he would 20 not depose you if you were truthful with 21 him during that private interview that you 22 gave him? 23 A. No. 24 Q. What's been marked as Romig-6,

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ORAL DEPOSITION OF EMILY MAYER, 8/28/2015

	Page 198	Page 200
1	<p>in there it has a paragraph, and it's the second paragraph, and it says -- let me read the first one: "Ryan: Hope your holidays were good. I wanted to follow up on the Voicemail I sent you and include the document which I told you we had Emily write out some of the information she indicated verbally.</p> <p>....."This document was written on Monday," December 22nd, "when Emily came home early from school after having talked to you."</p> <p>So, does that refresh your recollection that you were sent home early from school after speaking with Ryan, and then you spoke with your parents and then they asked you to write this document up?</p>	<p>1 something, or what is that?</p> <p>2 A. No. I have no clue what that means to this day.</p> <p>3 Q. It's my understanding that Mr. Romig was working at a gas station at the time. Were you aware of that at all?</p> <p>4 A. No.</p> <p>5 Q. Did he ever talk to you about negotiating gas contracts or something at that station?</p> <p>6 A. No.</p> <p>7 Q. Did you even know that he worked at a gas station?</p> <p>8 A. No.</p> <p>9 Q. Just for the record, it looks like, at least according to the email that's Romig-6, you went home on the 21st, and then on another email that was September it says the gas -- the Ewing Oil one was actually on the 22nd at 9:53 a.m., so that would be the day after you spoke with Ryan.</p>
10	<p>13 So, does that refresh your recollection that you were sent home early from school after speaking with Ryan, and then you spoke with your parents and then they asked you to write this document up?</p> <p>14 A. That's correct.</p> <p>15 Q. It was your stepfather that asked you to sit down and document some of the content of the text messages and some of the key texts that you could remember that were fresh in your mind?</p> <p>16 A. Yes.</p>	<p>10 Does that refresh your recollection at all or does it...</p>
17	<p>1 Q. Do you recall ever personally telling Ryan that Mr. Romig had said he had texted you that he wanted to be in you?</p> <p>2 A. No, Ryan never questioned me.</p> <p>3 Q. Did you ever tell Ryan, when you told him that the texts were inappropriate, that he was telling you that he wanted to be with you?</p> <p>4 A. Did I ever say that to Ryan?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. The email that we've referred to that was kind of odd, I believe that the text of that -- not the email; the test message, rather, states "This presentation is going to be rough. Ewing Oil contracts are difficult to negotiate."</p> <p>8 Does that refresh your recollection about the email that was after your meeting --</p> <p>9 A. That was the last thing he texted me.</p> <p>10 Q. Is that like code for</p>	<p>11 Page 199</p> <p>12 A. I mean, yes.</p> <p>13 MR. RUSSELL: Why don't we take this -- are we up to Mayer-2 or 3? What are we up to?</p> <p>14 MR. GROTH: Three, I believe.</p> <p>15 (Exhibit Mayer-3 was marked for identification)</p> <p>16 BY MR. RUSSELL:</p> <p>17 Q. I'm showing you an email that purports to be from your mother. Her name is Annette Smith, right?</p> <p>18 A. Yes.</p> <p>19 Q. And this is dated January 16th, 2010. And do you see the last sentence of that email says "Ryan, thank you again for the support you have given us and Emily"?</p> <p>20 A. Yes.</p> <p>21 Q. Did your mom ever tell you that she was appreciative of the support that Ryan had given you and your parents?</p> <p>22 A. She never mentioned that to me, but...</p> <p>23 Q. Do you know any reason why she</p>

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1 would write that if she didn't feel that 2 way? 3 MR. GROTH: Objection to the 4 form. You can answer. 5 A. My parents aren't awful people. 6 I'm sure that, if he was answering them 7 at all, they were appreciative of that. 8 My parents aren't monsters. 9 Q. --- Nobody's trying to stay they're ... 10 monsters or you're a monster. Nobody's 11 even trying to allude to that. I'm just 12 wondering, if she didn't feel that, do 13 you know why she would say that? 14 MR. GROTH: Objection. 15 A. I don't know what my mom felt. 16 Q. But you didn't feel you were 17 given the support from Ryan. Would that 18 would be accurate? 19 A. Correct. 20 Q. And were your parents 21 communicating to you what the 22 investigation was being revealed to them 23 through Ryan? 24 A. Can you repeat that?	1 Q. I'm going to show you what 2 we'll mark as Mayer exhibit four. 3 (Exhibit Mayer-4 was marked for 4 identification) 5 BY MR. RUSSELL: 6 Q. I'm showing you what's been 7 marked as Mayer-4. This is the copy of 8 complaint that was filed in this matter. 9 I'd like to ask you some questions about this here because there is 10 some mention of you in here. On page 11 eight of the complaint, paragraph 12 thirty-four, it says "In or about October 13 of 2009" -- do you see that? 14 A. Yes. 15 Q. (Continuing) -- "Defendant Romig 16 began to excessively text student EM, who 17 was being coached by Defendant Romig. 18 Specifically, these text messages commented 19 on EM's appearance and stated sexual 20 activities that Defendant Romig wanted to 21 engage in with EM." 22 Was there anything on document 23 Romig-6 that talked about comments that	
	Page 203	Page 205
1 Q. Sure. Do you have any 2 knowledge or recollection of your parents 3 communicating to you about what they 4 learned through Ryan's investigation? 5 A. No. 6 Q. So, whatever Ryan discovered, 7 you don't know because it wasn't 8 communicated either by Ryan or by your 9 parents to you. 10 A. Correct. I never spoke with 11 Ryan. He never questioned me -- 12 Q. After that first interview. 13 A. Correct, and he never asked me 14 any questions, just told me to leave. 15 And it was difficult for my parents to 16 get in contact with him. 17 Q. What gives you that impression? 18 A. I mean, you can see my mom in 19 these emails is leaving voice-mails. 20 Therefore, he's not as answering, so... 21 Q. Did you know that Ryan wasn't 22 able to access his emails if he was out 23 of state during the Christmas break? 24 A. I don't know that.	1 you made about Romig saying about your 2 appearance or activities? 3 A. No. 4 Q. I'm sorry, was that appearance? 5 A. No. 6 Q. Was there anything that you 7 prepared on Romig-6 that talked about 8 Romig wanting to engage in specific 9 activities with you? 10 A. Second thing right here. 11 Q. He said "I want to be in you." 12 A. Yes. 13 Q. And you interpreted that to 14 mean what? 15 A. That he wanted to have sex. 16 Q. And then the next paragraph 17 says "During the course of Defendant 18 Romig's contact with EM, he admitted to 19 EM that he had a prior sexual 20 relationship with another student, CC." 21 Do you know who CC is? 22 A. It could be Kristen Kennedy -- 23 I think that would be a KK, so I don't 24 know if --	

	Page 206	Page 208
1	Q. Yes, KK is mentioned further in 2 the complaint, but -- 3 A. I don't know. 4 Q. Did you ever have any knowledge 5 of a prior sexual relationship with a 6 student with the initials CC? 7 A. No. 8 Q. So, however that information was 9 gained by the plaintiff, it's not 10 something that came through you. 11 A. No. 12 Q. And then paragraph thirty-six 13 says, "EM" -- again, I'm assuming this is 14 you -- "had previously observed the 15 relationship between Defendant Romig and 16 LF." That would be Lauren Fretz? 17 A. Yes. 18 MR. GROTH: Objection. 19 Q. And you believe that they were 20 too close for a student/coach 21 relationship. Did you actually observe 22 the relationship or interaction between 23 Eric Romig and Lauren Fretz? 24 A. When she would come to	1 A. No, not at the time. 2 Q. How about after -- at any time? 3 A. I don't recall how I heard 4 this, but it was said that people were -- 5 I don't know if "aware" is the right 6 word, but they had sensed something 7 between the two of them. 8 Q. But nothing was ever confirmed. 9 A. No. 10 Q. So, it was just innuendo or 11 rumor? 12 A. Yes. 13 Q. And then the next paragraph 14 says "EM's boyfriend" -- that would be 15 Chase? 16 A. Correct. 17 Q. (Continuing) -- "and /or family 18 members reported Romig's inappropriate 19 sexual misconduct to Defendant Clymer." 20 That would be Ryan Clymer. 21 Do you know whether Chase ever 22 told Ryan Clymer that Mr. Romig had 23 sexual misconduct? 24 A. No.
1	practices, they were just very friendly 2 with each other. I mean, she of course 3 had graduated by then. But still, very 4 odd. 5 Q. What was it about that 6 friendship that you thought was too close 7 for a student/coach relationship? 8 A. Just everything about how they 9 interacted with each other. 10 Q. Give me some descriptive terms 11 or an example. Did they kiss or 12 something? Did they hug? 13 A. Hug, yes. The conversations -- 14 and I don't recall any of the 15 conversations that they had during those 16 practices, but it was just -- you 17 wouldn't kind of see that from somebody 18 that was your player to your coach. 19 Q. From your perspective. 20 A. Correct. 21 Q. Did anybody else ever comment 22 to you that they thought that the 23 relationship was inappropriate or too 24 close for a student/coach?	Page 207 1 Q. You don't know or he did not? 2 A. He did not. He never had a 3 conversation with Mr. Clymer until after I 4 had said something to him. 5 Q. And did Chase ever know that 6 the content of the text messages were, in 7 your opinion, sexually inappropriate? 8 A. Yes. 9 Q. And when did he learn that? 10 A. Well, when he first had seen 11 him texting me, Mr. Romig texting me. 12 Q. Do you recall what that first 13 text was? 14 A. No. 15 Q. And then it says in the next 16 paragraph "Defendant Clymer suspended EM," 17 which is you again, "during the course of 18 the investigation and prevented her from 19 playing basketball." 20 Were you ever suspended? 21 A. Not officially. I mean, they 22 just asked me to leave. 23 Q. Just like they separated Mr. 24 Romig as well until they could sort this

	Page 210	Page 212
1	out?	1 Q. And the reason we asked you
2	MR. GROTH: Object to the form.	2 about the co-captain issue -- it came up
3	Q. You can answer.	3 in some other setting, and I'm not sure
4	A. Yes.	4 where -- that both you and Chelsea were
5	Q. And when they sorted it out,	5 removed as co-captains of the team for a
6	you were brought back on the team and Mr.	6 brief period of time about a week before
7	Romig was no longer part of the team.	7 this revelation came about with respect to
8	A. Correct.	8 the excessive texting.
9	Q. And then it says in paragraph	9 Does that refresh your
10	thirty-nine, "Further, Defendant Romig	10 recollection at all?
11	engaged in inappropriate sexual conduct	11 A. Never happened.
12	with another female student, KK," which I	12 Q. Before this situation came to
13	think is Kristen Kennedy, "through	13 light involving this excessive texting and
14	Facebook and/or in person."	14 the inappropriate number of texts, had you
15	Do you have any knowledge of	15 ever been disciplined while at Faith
16	that?	16 Christian Academy for issues involving
17	A. No.	17 truthfulness or dishonesty such as
18	Q. The next paragraph says,	18 cheating on a test?
19	"Defendant Romig questioned KK about her	19 A. No.
20	sexual activities with KK's boyfriend."	20 Q. Never?
21	Do you have any knowledge of	21 A. No, not that I recall.
22	that?	22 Q. As you sit here today, is there
23	A. No.	23 any additional information that you would
24	Q. "Additionally, LF," which I	24 think would be helpful in getting us to
	Page 211	Page 213
1	suppose is Lauren Fretz, "again had	1 put the pieces together so that we can
2	reported to Defendant Clymer that she	2 have a fuller and more accurate picture
3	believed that Defendant and KK were	3 whether FCA acted appropriately in
4	personally involved."	4 conducting its investigations?
5	Do you have any knowledge of	5 MR. GROTH: Object to the form.
6	that?	6 Q. You can answer.
7	A. No.	7 A. I don't know.
8	Q. Technically, were you on	8 Q. Anyone else that you think
9	probation your senior year?	9 needs to be contacted in order to
10	A. I was never verbally told that,	10 determine whether Faith Christian Academy
11	no.	11 acted appropriately in conducting its
12	Q. You weren't sent a letter or	12 investigation?
13	anything saying you were able to come	13 A. Not that I'm aware of.
14	back, but it's on probation? You have to	14 MR. RUSSELL: I have no further
15	meet with Pastor Ron, and you can't have	15 questions.
16	any lates through January or anything like	16 MR. GROTH: Let me just put
17	that?	17 one comment on the record while I'm
18	A. I don't recall.	18 thinking of it.
19	Q. Did you ever sign an agreement	19 I think that CC in the
20	indicating that you had to abide by	20 complaint was probably a leftover from the
21	certain terms?	21 time when we were in a draft identifying
22	A. I don't recall if I had to	22 the people from FCA as AA, BB, CC and DD
23	sign anything through those counseling	23 instead of by their actual initials to
24	sessions or before the school year ended.	24 try to keep the other individuals

<p>1 anonymous, and I think that's why that 2 was left in there. That's my 3 professional recollection. I'm sorry, go 4 ahead.</p> <p>5 MS. KERNAN: We have no 6 questions.</p> <p>7 MR. KEMETHER: I have one or 8 two follow-ups, if that's all right.</p> <p>9 EXAMINATION.....</p> <p>10 BY MR. KEMETHER:</p> <p>11 Q. I think you said a little while 12 ago that when you got the subpoena, your 13 mother said "We're going to do this 14 because it's the right thing to do."</p> <p>15 What does that mean?</p> <p>16 A. Well, I think my parents were 17 aware of, you know, obviously how Faith 18 handled my situation. And what had 19 happened to the victim, I think they 20 thought that it would be best for us to 21 tell them what we knew and how they 22 handled...</p> <p>23 Q. Did you feel the same way?</p> <p>24 A. Feel the same way as...</p>	Page 214	Page 216
<p>1 Q. Your mother, who made this 2 statement.</p> <p>3 A. I did, but this isn't something 4 I wanted to be doing.</p> <p>5 Q. And one last thing: If I 6 remember correctly, Cheryl Alderfer is the 7 one who took you down to the meeting with 8 Mr. Clymer?</p> <p>9 A. Yes.</p> <p>10 Q. And she sat through the whole 11 meeting?</p> <p>12 A. Yes.</p> <p>13 Q. And she actually started the 14 meeting by saying to Mr. Clymer that you 15 have some things to tell him. Am I 16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. You said several times during 19 the deposition that Mr. Clymer asked you 20 nothing. Do I understand the purpose of 21 the meeting was for you to tell him some 22 things?</p> <p>23 A. Yes.</p> <p>24 Q. And you've already related to</p>	Page 215	Page 217

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ORAL DEPOSITION OF EMILY MAYER, 8/28/2015

1 CERTIFICATION

2

3

4 I hereby certify that the
5 testimony and the proceedings in the
6 foregoing matter are contained fully and
7 accurately in the stenographic notes taken
8 by me and that the copy is a true and
9 correct transcript of the same.

10

11

12

13

14

15 Lance A. Brusilow
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Eric Romig

Nace vs. Pennridge School District
May 4, 2015

<p style="text-align: right;">Page 1</p> <p>IN THE UNITED STATES DISTRICT FOR THE EASTERN DISTRICT OF PENNSYLVANIA CIVIL TRIAL DIVISION</p> <p>JAMES NACE, et al : CIVIL ACTION vs. PENNBRIDGE SCHOOL DISTRICT, : et al. : NO. 15-333</p> <p>Monday, May 4, 2015</p> <p>Oral deposition of ERIC ROMIG, held at STATE CORRECTIONAL INSTITUTE - RETREAT, 600 State Route 11, Hunlock, Pennsylvania, beginning at 10:00 a.m., on the above date, before LANCE A. BRUSILOW, Registered Professional Reporter, Notary Public, and Approved Reporter for the United States District Court.</p> <p>brusilow + associates 255 South 17th Street Suite 1503 Philadelphia, PA 19103 215.772.1717 www.brusilow.com</p>	<p style="text-align: right;">Page 3</p> <p>(APPEARANCES - CONTD.)</p> <p>KELLY, GRIMES, PIETRANGELO & VAKIL, P.C. BY: SEAN V. KEMETHER, ESQUIRE 30 East Second Street Media, PA 19063 ph: 610.585.0600 (skemether@kgpv.com) Counsel for Ryan Clymer and Russell Hollenbach</p> <p>ALSO PRESENT: FAITH CHRISTIAN ACADEMY BY: HENRY THOMPSON 700 N. Main Street Sellersville, PA 18960</p>
<p style="text-align: right;">Page 2</p> <p>APPEARANCES</p> <p>HORNSTINE PELLONI & HORNSTINE BY: DAVID GROTH, ESQUIRE 1500 Walnut Street Suite 300 Philadelphia, PA 19102 ph: 215.568.4968 (david@hornstine.com) Counsel for Plaintiffs</p> <p>MARSHALL, DENNIS HEY WARNER COLEMAN & GOGGIN BY: JOSEPH J. SANTARONE, ESQUIRE 2000 Market Street Suite 2300 Philadelphia, PA 19103 ph: 215.575.2626 (jsantarone@mdwec.com) Counsel for Faith Christian Academy</p> <p>EASTBURN & GRAY, P.C. BY: JOANNE D. SOMMER, ESQUIRE 60 East Court Street P.O. Box 1389 Doylestown, PA 18901 ph: 215.345.7000 (jsommer@eastburngray.com) Counsel for Pennridge School District and individual Pennridge defendants</p> <p>CASSIDY CONNOR PITCHFORD BY: CARLA E. CONNOR, ESQUIRE 295 East Swedesford Road Suite #346 Wayne, PA 19087 ph: 610.783.3513 (cconnor@ccplegal.com) Counsel for FCA, Ryan Clymer and Russell Hollenbach</p>	<p style="text-align: right;">Page 4</p> <p>1 (It is hereby agreed by and among 2 counsel that sealing, certification and filing are 3 waived; and that all objections, except as to the 4 form of the question, are reserved until the time 5 of trial)</p> <p>6 ERIC ROMIG, having been first duly 7 sworn, was examined and testified as follows: 8 (EXAMINATION)</p> <p>9 BY MR. GROTH:</p> <p>10 Q. Good morning, Mr. Romig. My name is David 11 Groth, and I represent James and April Nace and their 12 daughter Elizabeth Nace in a lawsuit that's currently 13 pending in Federal District Court for the Eastern 14 District of Pennsylvania against Pennridge School 15 District, Faith Christian Academy and some employees of 16 those schools: Mr. Hollenbach and Mr. Clymer at Faith 17 Christian, and Mr. Creeden and Mr. Babb at Pennridge.</p> <p>18 We're here today to take your deposition in 19 the case, to talk about the subject matter of this 20 litigation. Have you ever given a deposition before, a 21 civil deposition?</p> <p>22 A. No.</p> <p>23 Q. I'll explain to you a little bit about the 24 process so we can get through it a little bit more</p>

1 (Pages 1 to 4)

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Appendix 0225

Eric Romig

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<p>1 easily, but let me just tell you that we're going to go 2 over issues and facts that I think are important to the 3 case. I'm going to question you first. I'll ask as 4 many questions as I want or as I need in order to get 5 the information that I need, then in turn we'll go 6 around the room to the other attorneys and they'll have 7 a chance to follow up on the questions that I've asked 8 you or maybe ask you completely different questions 9 about facts and information that they want to get from 10 you as well. We'll keep doing that until none of the 11 attorneys have any more questions, and we'll conclude 12 the deposition at that time.</p> <p>13 MR. GROTH: This deposition, I'll just 14 note for the record, was court-ordered by Judge 15 Beetlestone to be held on this date.</p> <p>16 Let the record reflect we're taking 17 this deposition at the Correctional Facility at 18 SCI Retreat in Hunlock Creek, Pennsylvania, and 19 that the deposition is taken pursuant to the 20 judge's order and the deposition notice that our 21 office issued on April 22nd, 2015, which I've 22 marked as Romig Exhibit 1.</p> <p>23 (Exhibit Romig-1 was marked for 24 identification)</p>	<p>1 the question and know what you're responding to. 2 Let me complete the question before you begin 3 your answer. The court reporter here is going to make 4 a transcript of everything that's said, both the 5 questions and the answers, and he cannot take down two 6 people talking over each other at the same time. 7 So, if you agree to let me finish my question 8 before you begin answering -- and sometimes witnesses 9 want to jump in and provide the information that they 10 think the attorney's looking for, but they don't want 11 wait to hear the end of the question. So. Let me get 12 the opportunity to finish the question and I'll give 13 you the opportunity to complete your answer before I 14 start the next question. 15 If you answer a question, I'll assume that you 16 understood the question and that the information and 17 facts that you're giving me are your best recollection 18 of facts and events that took place maybe going back as 19 far as the early 2000s, 2003, 2004. 20 You have to give a verbal answer to all 21 questions; that is, you have to speak. No hand 22 gestures, no head-nods, no head-shakes, no uh-huh or 23 the like, whatever. We need a yes or no or some type 24 of narrative answer.</p>
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<p>1 BY MR. GROTH: 2 You can take a look at that. I think you 3 probably got a copy of that in the mail as well. Is 4 that correct? 5 A. Yes, sir. 6 Q. As I said, we're going to be asking you 7 questions that we think are important and looking for 8 facts and information that are relevant to the claims 9 in this case and to the defenses in this case, and let 10 me give you some instructions that will make this more 11 efficient for us to go through, especially since you 12 have not done it before. 13 As I understand it, you're representing 14 yourself in this litigation, correct? 15 A. Yes, sir. 16 Q. You are not represented by counsel? 17 A. No, sir. 18 Q. Let me give you some quick directions. First, 19 listen to the question to make sure you understand the 20 question, and if you don't understand the question -- 21 if it's vague or you just don't understand it -- ask me 22 to restate or rephrase or clarify the question for you, 23 and I'll be happy to do that so that when you do give 24 me an answer to a question, you will have understood</p>	<p>1 You must answer every question I ask you fully 2 and to the best of your ability. There may be other 3 objections to a question I ask you from the other 4 attorneys here. 5 They may object to a question for some legal 6 reason that you don't have to be concerned about. If 7 there is an objection to a question, simply allow the 8 objection to be stated by the other attorney and then 9 proceed to answer the question. 10 A. Yes, sir. 11 Q. All right? I'm going to ask you questions 12 looking for facts and information that you know 13 personally or for facts and information that you may 14 have gathered or heard from other people, something 15 somebody told you: A conversation you had with other 16 people and they may have provided you with some 17 information and you can provide that information to me. 18 A. Yes, sir. 19 Q. Hearsay is not an issue in a deposition like 20 it would be at trial, so the fact that somebody else 21 told you something doesn't mean you can't testify to it 22 here. 23 If you don't know the answer to a question I 24 ask you or you don't recall the information that I'm</p>

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<p>1 looking for, meaning that you knew it at one time but 2 so many years have passed that you don't recall the 3 information any more, tell me that and that will be a 4 sufficient answer.</p> <p>5 You're not here to guess or speculate or 6 assume anything in response to a question, so don't 7 think that you have to answer a question because you 8 don't have any facts or knowledge or information that 9 is responsive to that question.</p> <p>10 Is there any medical reason today why you're 11 not able to fully participate in the deposition and 12 answer the questions that the attorneys have for you?</p> <p>13 A. No, sir.</p> <p>14 Q. Are you taking any medications or drugs that 15 would affect your memory or ability to participate in 16 the deposition?</p> <p>17 A. No, sir.</p> <p>18 Q. Are you under the influence of any drug or 19 alcohol or any other substance?</p> <p>20 A. No, sir.</p> <p>21 Q. Do you understand that you are obligated to 22 answer all my questions truthfully and that you have 23 taken an oath and sworn to do so today?</p> <p>24 A. Yes, sir.</p>	<p>1 or whatever, but we can call out and you will be 2 allowed to do that.</p> <p>3 A. Okay.</p> <p>4 Q. Do you understand those instructions?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Let me get some background information about 7 you first. Let's talk about your educational 8 background. Can you just run through that 9 chronologically for me, please, starting with high 10 school graduation?</p> <p>11 A. I graduated from Faith Christian Academy in 12 1995 and graduated from Clearwater Christian College in 13 2003.</p> <p>14 Q. Where is that?</p> <p>15 A. In Clearwater, Florida.</p> <p>16 Q. And what did you major in in college?</p> <p>17 A. General studies education.</p> <p>18 Q. You got a BA degree?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Do you play baseball in college?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Four years?</p> <p>23 A. Three years.</p> <p>24 Q. You had some kind of leg injury or something</p>
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<p>1 Q. Just as if you were testifying at trial before 2 a judge and jury.</p> <p>3 A. Yes, sir.</p> <p>4 Q. And you understand that, if you don't answer 5 these questions truthfully, and that's proven to be the 6 case at some point, that there would be consequences 7 for your lying under oath?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Are you familiar with the term perjury?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Do you know that under Pennsylvania statute, a 12 person is guilty of perjury, which is a felony of the 13 third degree, if he makes a false statement under oath 14 or swears or affirms the truth of a statement 15 previously made when the statement is material and he 16 does not believe it to be true?</p> <p>17 Do you understand that?</p> <p>18 A. Yes, sir.</p> <p>19 Q. So, there would be consequences if you don't 20 know the truth in this deposition.</p> <p>21 A. Yes, sir.</p> <p>22 Q. If you need to take a break for any reason 23 during the deposition, just ask us. I'm not sure what 24 the procedure is if you have to take a bathroom break</p>	<p>1 that prevented you from playing the fourth year?</p> <p>2 A. I had a knee injury that did not completely 3 prevent me from playing, but I just decided it was 4 better not to.</p> <p>5 Q. What year was that, your third year or fourth 6 year? The injury.</p> <p>7 A. I played my freshman, sophomore and junior 8 year, not my senior year.</p> <p>9 Q. Do you have any other formal education or 10 vocational training of any type?</p> <p>11 A. No, sir.</p> <p>12 Q. Construction trades, anything like that?</p> <p>13 A. No, sir.</p> <p>14 Q. When you were growing up, were you a victim of 15 sexual abuse other harassment or exploitation?</p> <p>16 A. No, sir.</p> <p>17 Q. Has any family member been a victim of sexual 18 harassment, abuse or exploitation?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Who was that?</p> <p>21 A. My sister.</p> <p>22 Q. Your sister Kelly?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Did that take place at -- I'm going to call</p>

3 (Pages 9 to 12)

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<p>1 Faith Christian Academy FCA, just to shorten it a 2 little bit.</p> <p>3 A. Yes, sir.</p> <p>4 Q. (Continuing) -- did that happen while was a 5 student at Faith Christian Academy?</p> <p>6 A. Yes, sir.</p> <p>7 Q. What grade was she?</p> <p>8 A. I do not know all the details of when it 9 occurred or when it did not occur. I just know that it 10 occurred while she was a student at FCA.</p> <p>11 Q. You were born in what year?</p> <p>12 A. 1977.</p> <p>13 Q. What year was she born?</p> <p>14 A. 1978.</p> <p>15 Q. So, she was a year younger than you.</p> <p>16 A. Yes, sir.</p> <p>17 Q. So, you were at Faith Christian Academy with 18 her at the time that this occurred.</p> <p>19 A. I do not know when it occurred. I don't know 20 what year, if it occurred over a short period of time, 21 a long period of time. I've never been given the 22 details. I don't know.</p> <p>23 Q. Was it something, to your understanding, that 24 was not reported by her immediately after it happened?</p>	<p>1 but it was a county sentence.</p> <p>2 Q. Meaning he was at county prison, not state 3 prison?</p> <p>4 A. Yes, he never went to state prison.</p> <p>5 Q. Do you know how long the sentence was?</p> <p>6 A. If I remember correctly, it was eleven and 7 half to twenty-three months.</p> <p>8 Q. And do you know what he was charged with?</p> <p>9 A. I do not.</p> <p>10 Q. Do you know if he was charged with rape?</p> <p>11 A. I would assume not, by his sentence.</p> <p>12 Q. Did you go to the trial at all?</p> <p>13 A. I went to sentencing. For all the other 14 things, I was in college at that time in Florida.</p> <p>15 Q. Do you know whether or not there was an actual 16 jury trial?</p> <p>17 A. I don't believe so.</p> <p>18 Q. Did he plead guilty to something?</p> <p>19 A. I believe so.</p> <p>20 Q. Was your sister at sentencing?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Your parents were there?</p> <p>23 A. Yes, sir.</p> <p>24 Q. What was the impact on you, if any, of your</p>
<p style="text-align: center;">Page 14</p> <p>1 A. I don't know that as well.</p> <p>2 Q. And what was the nature of the sexual abuse or 3 harassment or exploitation that she was subjected to?</p> <p>4 A. I do not know.</p> <p>5 Q. Who was the perpetrator?</p> <p>6 A. John Longacre.</p> <p>7 Q. Jr.? Do you know if he's a junior?</p> <p>8 A. I do not know.</p> <p>9 Q. And at the time when the sexual abuse or 10 whatever it was took place, was he a teacher at FCA?</p> <p>11 A. Yes, sir.</p> <p>12 Q. What did he teach?</p> <p>13 A. I believe he taught some -- what I would term 14 odds-and-ends classes. I believe maybe accounting; I 15 believe a basic computer class.</p> <p>16 Q. Did you ever have him as a teacher?</p> <p>17 A. Yes, sir.</p> <p>18 Q. What did he teach you?</p> <p>19 A. Accounting and basic -- the computer class.</p> <p>20 Q. Was he charged with some kind of crime in 21 connection with behavior with your sister?</p> <p>22 A. Yes, sir.</p> <p>23 Q. What was the result of that?</p> <p>24 A. I believe he got -- I know he got jail time,</p>	<p style="text-align: center;">Page 16</p> <p>1 sister being subjected to this crime by Mr. Longacre? 2 How did it impact you?</p> <p>3 A. Being I was in college at the time, I wasn't 4 home to see what the impact was. Are you talking about 5 just me personally?</p> <p>6 Q. Yes, just you personally.</p> <p>7 A. I was disappointed, surprised.</p> <p>8 Q. Disappointed and surprised at Mr. Longacre.</p> <p>9 A. Yes.</p> <p>10 Q. Let me go back to my question. Maybe I was 11 unclear with it: What was the impact on you 12 personally, if any? How did you take what happened to 13 your sister? How did it affect you emotionally or 14 physically or whatever, if at all?</p> <p>15 A. I just wanted to support my sister.</p> <p>16 Q. Did she ever talk about it with you?</p> <p>17 A. No, sir.</p> <p>18 Q. Do you know if what happened with her and Mr. 19 Longacre while he was an employee of FCA occurred while 20 on school property?</p> <p>21 A. I do not.</p> <p>22 Q. Do you know if whatever contact, physical 23 contact, they had was on more than one occasion or just 24 one occasion?</p>

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1 A. I do not.	1 types of jobs you had, the number of years you spent
2 Q. To this day you have not talked to your	2 there and what kind of work you did, including, by the
3 sister --	3 way, coaching positions.
4 A. I was never told any details, nor did they	4 A. Okay. Outside of coaching I worked for R&R
5 want to talk about it.	5 Service Group in Doylestown.
6 Q. ...Have you ever had any contact with Mr.	6 Q. ...What years? Do you know?
7 Longacre after the sentencing hearing?	7 A. From 2003 to 200 -- until my arrest.
8 A. No, sir.	8 Q. That would be October 1st, 2013?
9 Q. Did you speak at the sentencing hearing?	9 A. 2013, yes.
10 A. No, sir.	10 Q. And what did you do for them?
11 Q. Do you remember how old you were,	11 A. I was a manager.
12 approximately?	12 Q. What kind of business is that?
13 A. Approximately?	13 A. Gasoline, oil, as well as auto mechanic.
14 Q. Yes.	14 Q. Is that business owned by some family member
15 A. Twenty.	15 or relative or something like that?
16 Q. What county was that?	16 A. No, sir.
17 A. Bucks.	17 Q. Where was that located?
18 Q. In the sentencing hearing did it come out in	18 A. At 290 West State Street in Doylestown.
19 court, either from the DA or from the judge or	19 Q. Did you ever hear of a company called Ewing
20 whatever, that Mr. Longacre had engaged in any other	20 Oil?
21 sexual misconduct anywhere else or at any other time?	21 A. Yes, sir.
22 A. Not that I'm aware of.	22 Q. What's Ewing Oil?
23 Q. Other than your sister's victimization by Mr.	23 A. Ewing Oil was the provider of gasoline for the
24 Longacre, was any other member of your family ever	24 R&R Service Group.
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1 subjected to any type of sexual abuse or harassment or	1 Q. Any other regular or full-time employment --
2 exploitation?	2 let's just say other than the coaching positions --
3 A. No, sir.	3 other than R&R Service Group?
4 Q. Your sister was at your sentencing, too,	4 A. No, sir.
5 wasn't she?	5 Q. Did you ever have any problems on that job
6 A. Yes, sir.	6 with regard to your conduct or behavior toward any
7 Q. Did you ever give her any details of your	7 female employees?
8 behavior or contact with Elizabeth Nace?	8 A. No, sir.
9 A. No, sir.	9 Q. No complaints, no accusations, no allegations
10 Q. You never spoke to her with any details at	10 about any sexual misconduct or any other inappropriate
11 all?	11 behavior or activity by you toward a woman employee?
12 A. No, sir.	12 A. No, sir.
13 Q. She never asked you any questions?	13 Q. Were there any woman employees there?
14 A. No, sir.	14 A. Yes, sir.
15 Q. Let's talk a little bit about your employment	15 Q. Did you ever hold a position anywhere as a
16 history. Again, can you take us through your	16 teacher?
17 employment history starting with your graduation from	17 A. No, sir.
18 college? You were twenty-one when you graduated from	18 Q. Never taught a course, either voluntarily or
19 college?	19 for compensation?
20 A. From college?	20 A. No, sir.
21 Q. Yes.	21 Q. Let's talk about your coaching career, as it
22 A. I was twenty-one, yes, sir.	22 were.
23 Q. Up until the time that you were employed by	23 When did you begin coaching? Any type of
24 Pennridge as a coach, if you can just remember the	24 coaching, at any level, for any type of educational

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1 institution or religious institution or what have you. 2 A. 2005 to -- I'm sorry. 3 Q. Go ahead. 4 A. 2009 or '10, I believe, at FCA. 5 Q. Coaching what? 6 A. High school girls basketball..... 7 Q. That was continuous? 8 A. Yes, sir. 9 Q. And when was that season? What's the length 10 of the season, from what month to what month? 11 A. November to February. 12 Q. In the school year 2008/2009, 2009/2010, were 13 there assistant coaches for that team? 14 A. Yes, sir. 15 Q. Was one of them Robin Landis? 16 A. Yes, sir: Robin Landis. 17 MS SOMMER: Who was it? 18 MR. GROTH: Robin Landis, L-a-n-d-i-s. 19 BY MR. GROTH: 20 Q. You had another assistant coach, Marc Hoover? 21 A. Yes. 22 Q. Were they both teachers at FCA, or were they 23 just coaches? 24 A. Just coaches.	1 coaching at Quakertown? 2 A. No, sir. 3 Q. When you were coaching at Quakertown, did you 4 know a female student named Alicia Hughes? 5 A. Yes. 6 Q. How did you know her? 7 A. She was a player of mine for, I believe, one 8 or two years. 9 Q. Was she one of the best players on the team? 10 A. One of the. 11 Q. How would you characterize your relationship 12 with her during those one or two years that she was a 13 player under your coaching? 14 A. Just like any other player. 15 Q. Other coaching positions, male or female. 16 A. I was at Faith Christian Academy High School, 17 boys baseball coach. 18 Q. What years? 19 A. Oh, boy. 2003/2004, I believe. 20 Q. Any other coaching experience other than 21 Pennridge. 22 A. Other than Pennridge? No, sir. 23 Q. Is there a reason why you only coached boys 24 baseball for 2003/2004 at FCA?
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1 Q. Any other assistant coaches during that period 2 of time, 2008 through the end of 2009? 3 A. I don't believe so. 4 Q. Other coaching positions. 5 A. Outside of Faith Christian Academy? 6 Q. I want all of them, wherever you were made a 7 coach. 8 A. Quakertown High School, I believe 2008 and 9 2009. 10 Q. Coaching what? 11 A. High school girls softball. 12 Q. Have you ever coached anything other than 13 basketball and softball? 14 A. No, sir. 15 Q. Anything other than girls teams? 16 A. Yes, sir. I coached -- 17 Q. Do you know what? Hold on with that for one 18 second. Let's finish Quakertown and we'll get to that. 19 A. Okay. 20 Q. Was it at Quakertown where you did boys 21 coaching? 22 A. No, sir. 23 Q. Let's finish with Quakertown. You were there 24 in 2008/2009, coaching girls softball. Any other	1 A. The reason I left as a boys baseball coach, I 2 was assistant coach at first with the gentleman who was 3 the head coach, and that was the reason I took the job, 4 to coach with him. And then when he left or retired 5 from that position, I stayed on one more year at the 6 request of the players. 7 Q. Who was the head coach? 8 A. The first year I was there? 9 Q. Yes. 10 A. Tim Kuhn. 11 Q. Over the years have you applied for coaching 12 positions at other schools, positions that you didn't 13 get or there weren't openings or whatever? 14 A. I believe I put a request in in 2013 to 15 Souderton High School. 16 Q. When you say put a request in, is that making 17 an application or a feeler, like an email -- 18 A. Like a feeler. I believe it was an email to 19 the athletic director. 20 Q. For what position? 21 A. The softball coach. 22 Q. Girls softball. 23 A. Yes, sir. 24 Q. And what happened to that?

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<p>1 A. I never heard back from them. It was 2 literally within the month of my arrest. 3 Q. You say within a month of your arrest. You're 4 talking about sometime in September of 2013? 5 A. September of 2013. 6 Q... At that time you were coaching the woman's 7 softball team -- girls softball team at Pennridge, 8 correct? 9 A. I was technically still with them, yes. 10 Q. What do you mean by "technically"? 11 A. At the end of every year I was free to decide 12 whether I would return or not or to pursue another 13 interest. 14 Q. Was it your intention to return to Pennridge 15 in September of 2013? 16 A. I was unsure. 17 Q. Why was that? 18 A. Just looking for something better because I 19 was only a junior varsity coach. 20 Q. Let's talk about Pennridge. 21 A. Yes, sir. 22 Q. When did you apply for a position with 23 Pennridge? 24 A. I did not apply. They contacted me.</p>	<p>1 Q. So, for a period of time you were also a coach 2 under Sylvia Kalazs? 3 A. No, sir. 4 Q. That was after you finished coaching? 5 A. Yes, sir. The year that David Babb left I 6 stepped down as softball coach. I only met Sylvia 7 Kalazs one time. 8 Q. So, you were never a coach while she was 9 athletic director? 10 A. No, sir. 11 Q. Was she at Quakertown while Babb was at 12 Quakertown in some other capacity, teacher or something 13 else? 14 A. I don't believe so. I believe she was retired. 15 She came out of retirement to take the position. 16 Q. All right. You said you knew David Babb from 17 his time as athletic director at Quakertown. How well 18 did you know him? Did you know him as anything other 19 than as a coach who was hired by him and played for 20 him? 21 A. No, sir. 22 Q. Did you know him socially? 23 A. No, sir. 24 Q. Go to your church?</p>
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<p>1 Q. Who contacted you? 2 A. David Babb. 3 Q. Did you know David Babb before he contacted 4 you? 5 A. Yes. 6 Q. How did you know him? 7 A. He was the athletic director at Quakertown at 8 the time I was a coach at Quakertown. 9 Q. Did he hire you at Quakertown? 10 A. Yes, sir. 11 Q. While you were at Quakertown -- and you were 12 only there for two seasons? 13 A. Yes, sir. 14 Q. (Continuing) -- was there an athletic director 15 there named Sylvia Kalazs? 16 A. Yes, sir. 17 Q. Was she after Babb or before Babb, or what? 18 A. After. 19 Q. And where did Babb go after -- I'm sorry. Did 20 Babb leave before Kalazs was hired as athletic 21 director? 22 A. Yes, sir. 23 Q. And what position did he leave to go to? 24 A. The athletic director at Pennridge.</p>	<p>1 A. No, sir. 2 Q. Did you ever meet him at any conferences, any 3 PIAA events or anything like that? 4 A. No, sir. 5 Q. You never met him before he hired you for 6 Quakertown. 7 A. No, sir. 8 Q. When did you first get contacted by David Babb 9 as athletic director of Pennridge to ask you about 10 coaching for Pennridge? 11 A. I believe it was the summer of 2011. 12 Q. And what were you doing at that time? Were you 13 coaching at all somewhere? 14 A. No, sir. 15 Q. How did he contact you? 16 A. Through email. 17 Q. What did he tell you? 18 A. That there was a position open at Pennridge 19 that he thought I would be interested in, that the 20 school could really use me to fill that position. 21 Q. That would be the girls JV softball team? 22 A. Yes, sir. 23 Q. Did you eventually meet with him about the 24 position?</p>

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<p>1 A. He had not -- he contacted me a couple of 2 times and had the varsity coach from Pennridge contact 3 me a couple times through phone and email to take the 4 position.</p> <p>5 I told him that I would show up at the school 6 to meet with the other coaches and then I needed some 7 time to decide whether I wanted to take the position or 8 not, so I never met with David Babb himself, no.</p> <p>9 Q. And was this position for the fall of 2011? 10 This would be the 2011/2012 academic year?</p> <p>11 A. Yes, sir.</p> <p>12 Q. You did talk to David Babb by telephone?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And you communicated by email, also?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Did he ask you anything about your coaching 17 experience after leaving Quakertown?</p> <p>18 A. No, sir.</p> <p>19 Q. At Quakertown you were coaching basketball, 20 right?</p> <p>21 A. Quakertown?</p> <p>22 Q. Yes.</p> <p>23 A. Softball.</p> <p>24 Q. I'm sorry, softball. And you only worked for</p>	<p>1 A. There were two background checks they ran. 2 I'm not quite sure what the name of them are, but one 3 was basically a criminal history and one was, I 4 believe, something to do with child-abuse history maybe 5 or something.</p> <p>6 Q. I think I asked you this a little earlier. 7 When you talked to David Babb about your potentially 8 taking this position at Pennridge, did you talk to him 9 about your coaching experience at FCA?</p> <p>10 A. I do not know.</p> <p>11 Q. Do you know if he knew that you were coaching 12 at FCA?</p> <p>13 A. I do not know that.</p> <p>14 Q. You were coaching at the same time at FCA as 15 you were coaching at Quakertown, correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. He didn't know that when he was athletic 18 director at Quakertown?</p> <p>19 A. I don't believe so.</p> <p>20 Q. Did Mr. Babb or the varsity coach, who was -- 21 who? What's the name of the varsity coach?</p> <p>22 A. At Pennridge?</p> <p>23 Q. Yes.</p> <p>24 A. Paul Koehler.</p>
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<p>1 him for a year or so at Quakertown, correct?</p> <p>2 A. Two years.</p> <p>3 Q. Okay.</p> <p>4 A. Two summers.</p> <p>5 Q. Two summers?</p> <p>6 A. Well, the spring of '08 and spring of '09. I 7 was hired the very beginning of 2008, right before the 8 season started.</p> <p>9 Q. And the season lasted January through May?</p> <p>10 A. No, sir. It was March through May.</p> <p>11 Q. March through May.</p> <p>12 A. Yes, sir.</p> <p>13 Q. There is no training or indoor drills or 14 anything in the winter?</p> <p>15 A. No, sir, because I was coaching at Faith 16 Christian Academy at the same time, so I didn't have 17 the time or the ability to do both.</p> <p>18 Q. Did you fill out an employment application for 19 the job at Pennridge?</p> <p>20 A. I don't believe so.</p> <p>21 Q. Do you know if they did any background checks 22 on you?</p> <p>23 A. Yes, sir.</p> <p>24 Q. What did they do?</p>	<p>1 Q. Is he still the varsity coach there?</p> <p>2 A. I do not know.</p> <p>3 Q. Do you know whether or not, from talking to 4 Mr. Babb or Mr. Koehler, they intended to speak to 5 anybody at your former coaching positions or 6 institutions to talk about your employment history at 7 those places? Did they say they were going to do that?</p> <p>8 A. Well, the only one in question would be FCA 9 because David Babb was at Quakertown at that time, so 10 he was there. So, I do not know if they had any 11 contacts with FCA or not.</p> <p>12 Q. Did you tell him to contact FCA about your 13 coaching experience at FCA?</p> <p>14 A. No, sir.</p> <p>15 Q. Did you tell Babb or Koehler to check with 16 them?</p> <p>17 A. No, sir.</p> <p>18 Q. Did you eventually take the position with the 19 JV girls softball team starting in the fall of 2011?</p> <p>20 A. I took the position in the winter of 2012.</p> <p>21 Q. What month?</p> <p>22 A. February.</p> <p>23 Q. Again, was there a formal application that you 24 made or a written application?</p>

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1	A. I don't know.	1 Q. Why not?
2	Q. You had done applications before in other	2 A. Because I didn't want the time commitment that
3	coaching positions, right?	3 I had at previous coaching positions. I was reluctant
4	A. Yes, sir.	4 to take the job in the first place.
5	Q. You did it in Quakertown?	5 Q. Now, your season could run through the end of
6	A. And FCA.	6 May, the playoffs?
7	Q. So, you're familiar with the process.	7 A. There were no playoffs in JV.
8	A. Absolutely.	8 Q. There are playoffs with the varsity team,
9	Q. Pennridge didn't submit one to you to fill	9 correct?
10	out?	10 A. Yes.
11	A. I believe the only paperwork I had to fill out	11 Q. At some point in the season Elizabeth Nace was
12	was to do the background checks.	12 moved up to the varsity team to play in the playoffs,
13	Q. To authorize background checks.	13 correct?
14	A. Yes, sir.	14 A. In 2013, yes.
15	Q. Do you know whether or not at that time, in	15 Q. Not 2012.
16	February of 2012, it was Pennridge's policy -- written	16 A. No, sir.
17	policy, school policy -- to check with former employers	17 Q. Okay. But with the playoffs with the varsity
18	of their potential employees to get information about	18 team -- you were the JV coach. Did you coach the
19	their employment history and background?	19 varsity team, or you were the assistant coach of the
20	A. I do not.	20 varsity team?
21	Q. You had mentioned these criminal checks and	21 A. No, sir.
22	the child-abuse checks. Have you ever been charged	22 Q. In 2012?
23	with a crime other than what we're talking about today?	23 A. No, sir.
24	A. No, sir.	24 Q. What about 2013?
	Page 34	Page 36
1	Q. With Elizabeth Nace.	1 A. No.
2	A. No, sir.	2 Q. Do you know if Elizabeth Nace was moved up to
3	Q. Never been charged with a crime?	3 play with the varsity team in the playoffs in 2013?
4	A. No, sir.	4 A. Yes, sir.
5	Q. Ever been arrested?	5 Q. So, she would have been playing for Coach
6	A. No, sir.	6 Kochler.
7	Q. Did you sign a contract with Pennridge in	7 A. Yes, sir, after our season ended.
8	February of 2012?	8 Q. Did you participate in those playoffs at all
9	A. Yes, sir.	9 in any way?
10	Q. A written contract.	10 A. At the games, yes.
11	A. Yes, sir.	11 Q. What did do you?
12	Q. Do you have a copy of it?	12 A. I was just on the bench.
13	A. No, sir.	13 Q. You weren't up in the stands. You were
14	Q. I don't mean on you right now, but did you	14 sitting on the bench with the team?
15	keep a copy of it yourself?	15 A. Yes, sir.
16	A. No, sir, I never was given one.	16 Q. Is there a dugout or just a bench?
17	Q. What was the term of the contract? Was there a	17 A. The dugout.
18	term on the contract, starting at a certain date and	18 Q. So, if Liz Nace was playing on the varsity
19	ending on a certain date?	19 team in 2013 and that team went to the playoffs, that
20	A. The agreement was the start of the season,	20 could stretch out the season until the end of May?
21	which was always in or around March 1st, to the last	21 A. Possibly.
22	day that my season ended. That was the agreement of me	22 Q. Did you sign another contract with Pennridge
23	taking the job because I did not want to do it all year	23 after the one that started on March 1, 2013?
24	round.	24 A. I never -- the contract for the season 2013, I

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<p>1 never signed the contract itself. I had the varsity 2 coach, Paul Koehler, sign it for me because of my work 3 commitment.</p> <p>4 Q. You mean he signed your name to it? 5 A. Yes, sir.</p> <p>6 Q. You authorized him to sign your name to it? 7 A. Yes, sir.</p> <p>8 Q. Okay. 9 A. Because I couldn't make it to the school.</p> <p>10 Q. Why is that? 11 A. They needed it by a certain deadline, and I 12 was working so much overtime during my regular job that 13 I could never make it during my school hours.</p> <p>14 Q. Same contract otherwise? 15 A. I believe so.</p> <p>16 Q. Were there any terms that were any different? 17 A. I never saw the contract.</p> <p>18 Q. Never had a copy of it after he signed your 19 name to it? 20 A. Never had a copy of it, either year.</p> <p>21 Q. When you signed your first contract with 22 Pennridge in November of 2012, starting as of March 23 1st, 2012, did you receive any other documents from 24 Pennridge other than a written contract to sign?</p>	<p>1 A. I believe so. 2 Q. What about FCA? 3 A. I believe I received the same paperwork. 4 Q. Similar subject matter, that type of thing? 5 A. Similar subject matter. 6 Q. On sexual harassment or abuse and drug-free, ... 7 that type of thing? 8 A. Yes, sir, and what was required of the coach. 9 Q. What was the title of that document at FCA, 10 the one that tells you what you're supposed to be doing 11 or not doing as a coach? Did it have a heading or name 12 or title? 13 A. I do not recall. It was a long time ago. 14 Q. Was it just for coaching as opposed to 15 teachers or staff employees or administrators? 16 A. I do not know. 17 Q. Would it be more like an employee handbook, an 18 employee of FCA, rather than just specifically 19 something to a coach? 20 A. I don't believe so. I believe it was 21 individual papers. They may have been coach-specific, 22 but I cannot say for sure. 23 Q. Did you keep them? 24 A. Currently?</p>
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<p>1 A. I signed the contract at the school itself. I 2 never received any paperwork. 3 Q. And I'm not talking about the contract itself. 4 We just talked about that. I'm talking about any 5 documents, like handbooks, coaching guidelines, rules 6 and regulations for coaches, rules and regulations for 7 students, sexual-harassment policy, drug-free policy, 8 anything like that at all. 9 A. I don't believe so. 10 Q. You had gotten those types of documents at 11 other places you worked, correct? 12 A. Yes, sir. 13 Q. Where did you get them? 14 A. Quakertown and Faith Christian Academy. 15 Q. And did they give you those documents upon 16 your start of employment for them as coach? 17 A. Yes. 18 Q. Did you have to sign some kind of form to 19 acknowledge that you received these documents from 20 them? 21 A. I believe there were other documents I had to 22 sign. 23 Q. And at Quakertown it included both a drug-free 24 policy and a sexual harassment or abuse policy?</p>	<p>1 Q. Yes. Did you keep them after you received 2 them from FCA? Did you throw them in the trash? Did you 3 keep them at your house? 4 A. I kept them until I was done coaching there. 5 Q. Did you read them? 6 A. Yes. 7 Q. What did it say about their policy, FCA's 8 policy, on sexual harassment or discrimination or 9 abuse? 10 A. I do not recall the specifics. 11 Q. What about with regard to any drug policy that 12 FCA had? Do you recall any specifics on that? 13 A. Just that there was a zero tolerance for any 14 drug use or anything like that. 15 Q. What about in the coach's handout and 16 whatever? Do you remember any of the details specific 17 to those written handouts? 18 A. I do not. The only one I remember is what 19 their requirements were, which is basically that you 20 had the experience or the knowledge of sport and 21 basically were qualified for the job. 22 Q. At either Pennridge or FCA, aside from 23 whatever documents you got at FCA about sexual 24 harassment or drug policy or coach handbook or whatever</p>

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<p>1 you want to call it, did you ever receive any type of 2 training -- I mean actually sitting in a room with 3 somebody and having them explain to you policies about 4 sexual harassment or abuse?</p> <p>5 A. No, sir. The paperwork that was given was 6 pretty self-explanatory, what's right and what's wrong.</p> <p>7 Q. But you can't remember any of the details of 8 that.</p> <p>9 A. I don't remember the exact word-for-word 10 details, but it was laid out specifically what you 11 should and shouldn't do.</p> <p>12 Q. What did that include, what you should or 13 shouldn't do?</p> <p>14 A. No physical contact and just, you know, 15 maintain a proper standing with the parents and the 16 players.</p> <p>17 Q. Was there anything in FCA's rules or policies 18 regarding texting of students or players?</p> <p>19 A. No, sir.</p> <p>20 Q. Again, you never remember getting any such 21 rules or regulations or policies from Pennridge at all, 22 correct? So, I can't ask you anything about what might 23 have been in their policies?</p> <p>24 A. Not that I recall. I'm not saying they did or</p>	<p>1 A. No, sir. 2 Q. Did you have any understanding when you were 3 working either at FCA or Pennridge that you had any 4 obligation, legal or otherwise, to report any suspected 5 incidents or events of sexual harassment or abuse that 6 you yourself observed or suspected?</p> <p>7 A. Yes, sir. 8 Q. How did you get that training, and where? 9 A. At FCA I believe it was in the paperwork. 10 Q. Okay. 11 A. The paper that I read. I can't say for sure 12 at Pennridge. I received the same thing, but with my 13 coaching history, I assume that it carries from school 14 to school. 15 Q. You said you received the same thing. 16 A. The paperwork? 17 Q. At Pennridge. 18 A. The paperwork? 19 Q. Yes. I thought you just said earlier that you 20 didn't recall getting any paperwork. 21 A. I don't recall getting any paperwork at 22 Pennridge, but I believe the paperwork I got from FCA, 23 which I figure carried through. . . 24 Q. So, you think at FCA -- and I should probably</p>
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<p>1 they didn't. I just do not recall.</p> <p>2 Q. Do you recall signing any authorization with 3 Pennridge acknowledging receipt of any policies or 4 procedures or rules regarding sexual harassment or 5 abuse?</p> <p>6 A. I know for a fact I did not in 2013. I can't 7 say for 2012. Maybe there was a carryover from year to 8 year. I don't know what the policy is.</p> <p>9 Q. But you have no recollection of receiving it 10 in 2012, either, correct?</p> <p>11 A. No, sir.</p> <p>12 Q. Let's talk about training on sexual-harassment 13 policies and practices at Pennridge.</p> <p>14 Did you ever receive any training from any 15 administrator, faculty member, outside consultant that 16 they brought in to tell you this is what you're allowed 17 to do, this is what you're not allowed to do?</p> <p>18 A. No, sir.</p> <p>19 Q. Did you ever receive any training at Pennridge 20 or FCA regarding your obligation, legal or otherwise, 21 to report any instances of child sexual abuse or 22 harassment or misconduct that you personally suspected 23 or observed?</p> <p>24 Do you understand the question?</p>	<p>1 do this one at a time, but you think at FCA they 2 actually did provide some written explanation of your 3 obligations to report suspected child abuse or sexual 4 abuse, or whatever, as part of their policies and 5 practices and rules and regulations, correct?</p> <p>6 A. Yes, sir, but you had to sign and date them at 7 the bottom as well.</p> <p>8 Q. But you don't have any recollection of 9 receiving that type material, written material, or 10 signing any acknowledgment for those materials at 11 Pennridge, correct?</p> <p>12 A. I cannot say yes or no.</p> <p>13 Q. Okay.</p> <p>14 A. And then I went into actual personal training 15 on the issue.</p> <p>16 Q. At FCA was there any personal training of you 17 by an administrator or faculty member or a consultant 18 about a sexual-harassment policy or sexual-abuse 19 policy?</p> <p>20 A. I never received that at any schools.</p> <p>21 Q. At any school, including Pennridge.</p> <p>22 A. All of them.</p> <p>23 Q. Was it your understanding while you were a 24 coach at FCA and a coach at Pennridge that you had a</p>

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<p>1 legal obligation -- and by legal, by law -- that there 2 was a law that said that you, as an employee of the 3 school, had a legal obligation to report suspected 4 child abuse or sexual exploitation to some 5 administrator at the school?</p> <p>6 A... If I witnessed any, yes.....</p> <p>7 Q. If you witnessed or suspected it. Whether you 8 witnessed it or not, even if you suspected it.</p> <p>9 A. I don't know. I can't say for sure.</p> <p>10 Q. You can't say whether that was your 11 understanding about -- I'm not asking you if that's 12 true or false.</p> <p>13 I'm asking you was it your understanding back 14 at FCA as a coach and at Pennridge as a coach that you 15 had some legal obligation to report such behavior if 16 you suspected it was taking place.</p> <p>17 A. Legally, no, but if there was, you know, I 18 would.</p> <p>19 Q. Let me just make sure I understand. Is 20 it your testimony that you did not understand when you 21 worked for FCA and Pennridge as the coach that you had 22 a legal obligation to report any suspected child abuse 23 to a school administrator?</p> <p>24 A. No.</p>	<p>1 she was, I believe, a freshman at the time, in the 2 spring of 2012.</p> <p>3 Q. Did you meet her in the spring of 2012?</p> <p>4 A. Yes, sir.</p> <p>5 Q. How did you meet her?</p> <p>6 A. Through the tryouts for that particular 7 season, for the 2012 season.</p> <p>8 Q. I'm sorry, did you say spring 2012?</p> <p>9 A. Yes, sir.</p> <p>10 Q. You didn't know her before that, correct?</p> <p>11 A. No, sir.</p> <p>12 Q. So, the first contact you had with Elizabeth 13 Nace is when she tried out for the Pennridge girls JV 14 softball team that Pennridge made you the head coach 15 of.</p> <p>16 A. My first contact was the first day of tryouts 17 in 2012, yes, sir.</p> <p>18 Q. And you were the head coach at that time of 19 Pennridge.</p> <p>20 A. Of the junior varsity, yes, sir.</p> <p>21 Q. And you didn't have any contact with Elizabeth 22 Nace as coach or assistant coach -- you were assistant 23 coach of the Sellersville Belles.</p> <p>24 A. I was the head coach.</p>
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<p>1 Q. Have you given me all of your coaching 2 positions?</p> <p>3 A. Yes.</p> <p>4 Q. What about the Sellersville Belles?</p> <p>5 A. Are you asking for the educational-institution 6 coaching jobs? Sellersville Belles was recreation.</p> <p>7 Q. You term that as recreational?</p> <p>8 A. Yes, sir.</p> <p>9 Q. When did you coach the Sellersville Belles?</p> <p>10 A. August and September of 2013.</p> <p>11 Q. And then you were arrested October 1st, so 12 that ended that.</p> <p>13 A. Yes.</p> <p>14 Q. And Elizabeth Nace was on that team?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And had been on that team for some time?</p> <p>17 A. For two months.</p> <p>18 Q. Had she just started on the team?</p> <p>19 A. Yes.</p> <p>20 Q. Would it be correct to say that the first 21 contact that you had with Elizabeth Nace was as an 22 employee of the Pennridge School District, coaching her 23 while she was on the JV girls softball team?</p> <p>24 A. She was not on any team at the time because</p>	<p>1 Q. You were the head coach of the Sellersville 2 Belles.</p> <p>3 A. Yes.</p> <p>4 Q. For those two months?</p> <p>5 A. Yes, sir.</p> <p>6 Q. You didn't have any contact with her in 7 connection with your capacity as head coach of the 8 Sellersville Belles until over a year later, after you 9 met her for tryouts for the spring of 2012 season at 10 Pennridge, correct?</p> <p>11 A. I don't understand the question.</p> <p>12 Q. Okay. Whatever contact you had with Elizabeth 13 Nace as head coach of the Sellersville Belles didn't 14 take place until over a year after you were already the 15 head coach of the JV team at Pennridge, correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Who did you replace as the head coach of the 18 Belles?</p> <p>19 A. There was none. There was the second team, 20 and they only had one team the previous year.</p> <p>21 Q. There were two teams?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And when they formulated the second team, you 24 became the head coach of the second team?</p>

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1	A. Yes, sir.	1 play.
2	Q. Who was the head coach of the first time?	2 Q. How many members are in this league?
3	A. Paul Koehler.	3 A. Including me? Ten.
4	Q. Same as the high school varsity head coach.	4 Q. Were most of those members friends of yours?
5	A. Yes, sir.	5 A. Yes, sir.
6	Q. Who hired you for the Belles position?	6 Q. Were any of those members employees at FCA?
7	A. Paul Koehler.	7 A. Yes, sir.
8	Q. Was there any application?	8 Q. Who?
9	A. No, sir.	9 A. Russell Hollenbach, Marc Hoover and Dale Moe.
10	Q. Was there any type of contract, oral or otherwise, written?	10 Q. Who was he?
11	A. No, sir.	11 A. He was a teacher at FCA.
12	Q. Was there any type of compensation?	12 Q. Okay.
13	A. No, sir.	13 A. Tim Weaver.
14	Q. Strictly voluntary?	14 Q. Who is he?
15	A. Yes, sir.	15 A. He was a teacher at the time.
16	Q. Did you have to be approved by a board or something like that, or did Koehler make the decision himself?	16 Q. At FCA?
17	A. He is the board.	17 A. Yes, sir. I believe that's it.
18	Q. He is the board?	18 Q. Those are the only people from FCA?
19	A. As far as I know.	19 A. The school, yes, sir.
20	Q. Now, other than this recreational team, did you coach at any other recreational teams?	20 Q. The other five or so members, are they from other places other than FCA?
21	A. Yes, sir.	21 A. Yes, sir -- not schools.
22	Q. He is the board?	22 Q. Not schools?
23	A. As far as I know.	23 A. Yes, sir.
24	Q. Now, other than this recreational team, did you coach at any other recreational teams?	24
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1	A. Back in 2004 I coached a year at the RASA, the Quakertown travel team.	1 Q. Just Pennridge friends of yours?
2	Q. Coached what?	2 A. Just friends, yes, sir.
3	A. Girls softball.	3 Q. Back in 2013 where did you live?
4	Q. Head coach?	4 A. Quakertown.
5	A. Yes, sir.	5 Q. Address?
6	Q. Only for one year?	6 A. 1247 Fieldstone Court.
7	A. One year.	7 Q. Who did you live there with in 2013?
8	Q. Was that voluntary?	8 A. My wife and kids.
9	A. Yes, sir.	9 Q. Stephanie?
10	Q. And who hired you for that, David Babb?	10 A. Yes, sir.
11	A. No, he had nothing to do with RASA. I believe it was a man named Paul Hetrick.	11 Q. Chelsea?
12	Q. Any other recreational teams?	12 A. She was living in Colorado at the time. She was in veterinary school.
13	A. No, sir.	13 Q. How many other kids?
14	Q. I saw in some documents a reference to -- I don't know if it was a league or a team, but I think it was shorthand for something and I didn't understand it: Strat, S-t-r-a-t?	14 A. Three.
15	A. That's a fantasy baseball league.	15 Q. What are their names?
16	Q. How long have you been doing that?	16 A. Abbe, Chase, and Carson.
17	A. Up to my arrest. Five years, maybe.	17 Q. We had mentioned your leg issue that ended -- sort of ended your college baseball career. Did you have any other out-of-the-ordinary health issues any time prior to October 1st, 2013?
18	Q. And what does Strat stand for?	18 A. Yes, sir.
19	A. It's Strat-O-Matic. It's a board game you	19 Q. What was that?
20		20 A. I had a heart ablation done in, I believe,
21		21
22		22
23		23
24		24

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1 September of 2009.	1 headaches, shortness of breath, and just needed a few
2 Q. September 2009.	2 seconds to gather myself.
3 A. I believe so.	3 Q. Did you have any difficulty with your recovery
4 Q. Where was that done?	4 after this procedure in September of 2009?
5 A. Doylestown Hospital.	5 A. Yes. There were times I still have the
6 Q. Did they use catheters to correct the	6 irregular heartbeat and still experience headaches, and
7 structural heart problem that you had that was causing	7 at times shortness of breath. It was triggered by the
8 some kind of arrhythmia or something?	8 stress.
9 A. Yes, sir.	9 Q. What kind of stress?
10 Q. Afterwards were you taking any type of	10 A. Could be physical from the job or...
11 anticoagulants, coumadin or warfarin or anything like	11 Q. Family?
12 that?	12 A. No, sir.
13 A. No, sir.	13 Q. Money?
14 Q. Do you remember the exact date of your	14 A. Yes, sir.
15 procedure?	15 Q. Your relationship with players?
16 A. I don't, no, sir.	16 A. No, sir.
17 Q. Who was the doctor?	17 Q. Relationship with her parents?
18 A. Dr. Singh Sandraglo.	18 A. With my parents?
19 Q. Can you spell it phonetically?	19 Q. No, with the players' parents.
20 A. S-a-n-d-r-a-g-l-o.	20 A. No, sir.
21 Q. Do you know how long you had the heart	21 Q. Did Coach Landis and Coach Hoover know about
22 condition that led to that procedure?	22 this condition that you had?
23 A. At least a few years.	23 A. No.
24 Q. Did that heart condition that you had before	24 Q. Did you tell them about your heart condition
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1 the procedure prevent you or restrict you or limit you	1 and the surgical procedure that you had?
2 in any way from any of your work activities or your	2 A. Not until I was diagnosed shortly before
3 coaching activities?	3 surgery.
4 A. No, sir, just caused me pain.	4 Q. They knew about the surgery, though?
5 Q. On a regular basis or intermittent basis?	5 A. Yes, sir.
6 A. On a regular basis.	6 Q. In terms of your recovery, did you have to
7 Q. What kind of pain?	7 take any medications or do anything special to promote
8 A. Shortness of breath. My heart would beat real	8 your recovery?
9 fast and cause like temporary blackouts.	9 A. Just rest.
10 Q. When you say "temporary," how temporary?	10 Q. Were you still able to work full time at R&R?
11 A. Seconds.	11 A. Yes, sir.
12 Q. Ever happen while you were at FCA?	12 Q. Still able to carry out all of your coaching
13 A. Yes, sir.	13 obligations in 2009, both at Quakertown and FCA?
14 Q. Where people saw it happen?	14 A. After the heart -- after I had the heart
15 A. They saw that I was having a problem, yes.	15 ablation done in 2009, I was no longer a coach at
16 Q. Who saw that you were having a problem?	16 Quakertown, only at FCA for a couple months.
17 A. My assistant coaches.	17 Q. And were you able to carry out all those
18 Q. Happened during softball practice or a game?	18 duties and responsibilities as coach for those few
19 A. Basketball at FCA.	19 months at FCA?
20 Q. And who were the coaches?	20 A. Not as well as I would have liked, no.
21 A. Robin Landis and Marc Hoover.	21 Q. But you didn't --
22 Q. When these events would occur, what would you	22 A. I took breaks. We didn't practice as often as
23 do?	23 we did in the previous years.
24 A. Just go off to the side. I had major	24 Q. But you didn't miss any practices or games or

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1 anything like that? 2 A. No, sir. Just kind of shortened up the work 3 load compared to previous years. 4 Q. You graduated from FCA, you said, in 1995. 5 Did you go to FCA from kindergarten through twelfth 6 grade? 7 A. Eleventh through twelfth grade. 8 Q. Was Ryan Clymer a classmate of yours? 9 A. Yes, sir. 10 Q. Was he in the same grade? 11 A. Yes, sir. 12 Q. He went with you the whole way, from first 13 through twelfth grade? 14 A. Yes, sir. 15 Q. Was he a personal friend of yours? 16 A. Yes. 17 Q. How good a friend? I mean, in terms of your 18 sphere of friends, was he your best friend or regular 19 friend or just an acquaintance, or what? 20 A. A friend, not a best friend. 21 Q. Do you know his family? 22 A. Yes, sir. 23 Q. Do you know his father? 24 A. Yes, sir.	1 Q. Is FCA related to some -- FCA, the school, 2 related to some church, affiliated with a church? 3 A. Currently? 4 Q. No, back when you were a student there. 5 A. Yes, sir. 6 Q. What was the church name? 7 A. Faith Baptist Church. 8 Q. Is it in the same location, same property? 9 A. Yes, sir. 10 Q. Were you a member of the church also? 11 A. Yes, sir. 12 Q. Ryan Clymer was a member of the church? 13 A. That I don't know. 14 Q. How about Russell Hollenbach? 15 A. Yes, sir. 16 Q. What about Robin Landis? 17 A. I believe she was. 18 Q. What about Marc Hoover? 19 A. No, sir. 20 Q. Have you ever been treated for a drinking or 21 drug problem? 22 A. No, sir. 23 Q. Have you ever had what you consider to be, 24 whether you were treated or not, a drinking or a drug
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1 Q. Who was his father? 2 A. Bob Clymer. 3 Q. Is he connected with FCA in any way? 4 A. Currently? 5 Q. Yes, currently. Let's start with currently. 6 A. I don't know. 7 Q. What about back in the years where you were 8 going there as a student up through high school? 9 A. No, sir. 10 Q. Do you know if he founded the school? 11 A. No, sir. 12 Q. You don't know, or he didn't? 13 A. He did not. 14 Q. He did not. When your sister was a victim of 15 sexual abuse while at FCA, he would have been in his 16 college years as well, correct? 17 A. Yes, sir. 18 Q. Do you know if he went to college? 19 A. Yes. 20 Q. Where did he go? 21 A. Tennessee Temple University. 22 Q. Where is that? I know it's in Tennessee, but 23 where? 24 A. I don't know.	1 problem? 2 A. No, sir. 3 Q. Why did you stop coaching at Quakertown? 4 A. Because of the physical issues I was having, 5 the same reason I stepped down from Quakertown and FCA 6 at the same time. 7 Q. All right. You submitted letters or emails or 8 whatever, a resignation, on the same day, correct? 9 A. Email. 10 Q. January 5th, 20... 11 A. '10, maybe? 12 Q. '10, okay. Was that the only reason you 13 stepped down from both places? 14 A. That was the reason that I stepped down from 15 Quakertown. 16 Q. And why did you step down from FCA? 17 A. Well, after the allegations that were in the 18 complaint were out and I had a meeting with Ryan Clymer 19 and Russ Hollenbach, they told me to -- after 20 discussing it with the one person mentioned in the 21 complaint and her parents and whatnot, they were trying 22 to figure out a solution to the problem because they 23 did an investigation for, I'd say, approximately two to 24 three weeks after they asked me if I would step aside

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1 for the rest of the season, and it was suggested to me 2 to come back the following season, which I declined 3 because it was just too much stress, caused me physical 4 problems.	1 documents, which I think he sent to everyone -- 2 Carla, you got those, right? 3 MS. CONNOR: I did. 4 MR. GROTH: I'm sorry. He sent them to 5 me; I sent them to all counsel. So, all counsel 6 had these documents already.
5 Q. Okay, we're going to break that down. I asked 6 you both Quakertown and about resigning at Quakertown 7 and leaving FCA, but let's start with Quakertown first. 8 You said there was no other issue at 9 Quakertown other than your health considerations. Is 10 that correct? 11 A. No, sir. 12 Q. Were there any problems that you had with 13 parents or students or players at Quakertown, 14 especially female players? 15 A. No, sir. 16 Q. No allegations or accusations or suspicions 17 about some inappropriate behavior between you and any 18 of the students at Quakertown? 19 A. Not at all. Any and all contact went through 20 my assistant coaches, who were female. 21 Q. When you were at Quakertown, did you text or 22 email your players? 23 A. Not at all. 24 Q. Why not?	7 He responded to the subpoena by sending 8 me these documents, and I'm marking the entire 9 packet of documents that he sent to me. I want to 10 go over a couple of documents with you. 11 THE WITNESS: Sure. 12 (Exhibit Romig-2 was marked for 13 identification) 14 BY MR. GROTH: 15 Q. Some of these I think you may have seen 16 because they were addressed to you. I'm looking at a 17 letter from Nancianne Edwards, Director of Human 18 Resources, to Eric Romig dated November 12, 2009, 19 appointing Mr. Romig as head girls softball coach for 20 the senior high school for the 2009/2010 school year. 21 The rate of pay for this activity will be \$3,198.01. 22 Do you recall seeing that letter? 23 A. I believe so, yes. 24 Q. Now, that is the year that you did not finish
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1 A. Because I set a policy in place that any and 2 all communication would go through the coaches. 3 Q. Why did you do that? 4 A. Because when I first got hired at the job they 5 already had one female assistant in place, and I 6 brought on another one who was a mother of one of the 7 girls on the team, and at our first coaches meeting we 8 decided that was best. 9 Q. Did Quakertown have any written policy or 10 procedure or practice prohibiting texting or emailing 11 between coaches and players? 12 A. Texting? 13 Q. Texting or email. 14 A. No. 15 MR. GROTH: I'm going to mark a letter 16 dated April 1st, 2015 and a number of attached 17 documents as Romig Exhibit 2. 18 The letter, just for identification 19 purposes, is from Jeffrey Garton, an attorney for 20 the Quakertown Community School District, who was 21 responding to a subpoena that I issued to 22 Quakertown asking for the employment records and 23 personnel records for Eric Romig. 24 I've marked the whole packet of	1 out, correct? 2 A. Yes, sir. I resigned from there, I believe, 3 two months later, approximately. 4 Q. Two months after November 12th, 2009. 5 A. Yes, sir. 6 Q. And you resigned with an email to Sylvia 7 Kalazs dated January 5th, 2010, which is one of the 8 documents in Romig Exhibit 2. Is that correct? Is that 9 your email? 10 A. Yes, sir. 11 Q. So, at the time that you resigned, Ms. Kalazs 12 was the athletic director at Quakertown, correct? 13 A. Yes, sir. 14 Q. In this email you refer to this heart ablation 15 that you had done "a couple months ago" and that you 16 were going to go away from coaching for a while. Is 17 that correct? 18 A. Yes, sir. 19 Q. You actually started there as head softball 20 coach at the senior high school for the 2007/2008 21 school year. Is that correct? As evidenced by a 22 letter to you from Nancianne Edwards dated March 28th, 23 2008. 24 A. Yes, sir, signed in April 2008.

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